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AUTHOR Owens, Stephen
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ABSTRACT

This report contributes to the comprehensive evaluation of the Common Core of Data (CCD) program by providing an analysis of CCD definitions in order to identify potential classification problems. At the time of the evaluation, the CCD program consisted of four surveys. The focus of this evaluation is on the "Public Elementary/Secondary Education Agency Survey." The evaluation process was initiated by researching state statutes and administrative codes to determine the powers, governance, and services provided by agencies in each state. A detailed analysis of CCD definitions reveals that these definitions are generally inadequate. Many are neither exhaustive nor inclusive. The inadequacy and misinterpretation of these definitions leads to unreliable and invalid data. CCD definitions often do not draw a clear distinction between school and agency surveys. The definitions should be revised to be flexible and exhaustive, with clear documentation and explanation provided for instances in which individual arrangements in states differ from conventional approaches. All education surveys that use CCD definitions as their sampling frame should be coordinated. Changes are especially needed in the areas of enrollment and geographic coding. (Contains two tables.) (SLD)

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Technical Report March 1999

Classification Evaluation of the 1994–95 Common Core of Data: Public/ Elementary/Secondary Education Agency Universe Survey

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Technical Report March 1999

Classification Evaluation of the 1994–95 Common Core of Data: Public/ Elementary/Secondary Education Agency Universe Survey

Stephen Owens
Bureau of the Census

Beth Young
Project Officer
National Center for Education Statistics

U.S. Department of Education
Office of Educational Research and Improvement NCES 1999-316

U.S. Department of Education
Richard W. Riley
Secretary

Office of Educational Research and Improvement
C. Kent McGuire
Assistant Secretary

National Center for Education Statistics
Pascal D. Forgione, Jr.
Commissioner

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Foreword

This report was prepared for the National Center for Education Statistics (NCES) by the Governments Division of the Bureau of the Census. The principal author was Stephen Owens of the Governments Division. The report is the second in a series that constitutes a comprehensive evaluation of the Common Core of Data surveys (CCD).

The purpose of the comprehensive evaluation is to assess the quality of survey data as it relates to coverage, classification, reliability, validity, and survey design estimation. This report contributes to the comprehensive evaluation by providing an analysis of CCD definitions in order to identify potential classification problems.

The recommendations contained in this report are those of the author, and the Census Bureau. The results of this evaluation will be analyzed by the National Center for Education Statistics. NCES will then determine which changes to adopt for the survey, and how the changes will be implemented.

Acknowledgements

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Abbreviations Used In This Report

The following abbreviations are used frequently throughout this report:

CCD—Common Core of Data

LEA—Local Education Agency

NCES—National Center for Education Statistics

DOD—Department of Defense

BIA—Bureau of Indian Affairs

RESA—Regional Education Service Agency

SASS—Schools and Staffing Survey

FIPS—Federal Information Processing Standard

NPEFS—National Public Education Fiscal Survey

CDP—Census Designated Place

FTE—Full Time Equivalency

IEP—Individualized Education Program

BOCES—Board of Cooperative Educational Services

CMSA—Consolidated Metropolitan Statistical Area

PMSA—Primary Metropolitan Statistical Area

MSA—Metropolitan Statistical Area

TIGER—Topologically Integrated Geographic Encoding and Referencing

PSS—Private School Survey

IPEDS—Integrated Postsecondary Education Data System

INTRODUCTION

CCD Agency Survey Classification Evaluation, 1994–95

The purpose of this evaluation is to analyze and document classification issues. The results can be used for ongoing process improvement of the CCD surveys. This evaluation also explores such issues as school district geography, enrollment, governance, history, and service delivery and relates each to agency and school classification.

During the reference frame of this evaluation, the Common Core of Data (CCD) statistical program consisted of four separate surveys. These were the "Public Elementary/Secondary Education Agency Universe Survey" (hereafter referred to as the agency survey), the "Public Elementary/Secondary School Universe Survey" (hereafter referred to as the school survey), the "State Non-Fiscal Survey," and the "National Public Education Fiscal Survey (NPEFS)."

This evaluation was undertaken primarily to examine the agency portion of the survey, but it does integrate the school portion for certain purposes. Agencies are authorized to perform certain services, and operate certain types of schools under state law. A comparison of school types reported by various agencies can be found in chapter five.

A detailed analysis of CCD definitions contained in both the glossary and field description portions of the instructions for completing the survey, is also included. The purpose of this analysis is to describe potential definitional inconsistencies, omissions and redundancies. The analysis is not intended to serve as a framework for a new set of definitions, but it describes possible validity and reliability problems as they relate to survey definitions.

The evaluation process was initiated by researching state statutes and administrative codes to determine the powers, governance, service area and services provided by agencies existing in each state. This research was based on existing research done by the Bureau of the Census in connection with the 1992 Census of Governments and updated based upon state legislation passed after the reference date of that Census. These findings are included in Tables 1 and 2.

Summary of Major Findings and Recommendations

- The CCD survey is used as a basis for many other surveys within the Department of Education. It would be an ideal platform on which to unify public elementary/secondary educational definitions for all related surveys.

- The full potential of the CCD survey has yet to be realized. An improved CCD survey could take on several important roles.

- CCD definitions are generally inadequate. Many are neither exhaustive nor exclusive, and present obvious problems for respondents. The inadequacy of and misinterpretation of survey definitions leads to unreliable and invalid data.

- Schools and agencies are canvassed in separate surveys, but CCD definitions do not provide a clear distinction between the two components.

- To reduce reporting errors, refinements in survey methodology should be explored. Possibilities include assigning a central reference person to interpret survey definitions, establishing state/federal definitional crosswalks, directly canvassing local education agencies, and restructuring the survey to meet state reporting capabilities.

- CCD definitions should be revised so that they are both flexible and exhaustive. Individual arrangements in states which differ from conventional approaches, and cannot be made to fit into the definitional framework, must be clearly documented and explained.

- In order to prevent duplication of effort and unnecessary respondent burden, all education surveys which use the CCD as their sampling frame should be coordinated. Definitions should be unified where possible, and information should be shared between surveys where possible.

- Enrollments from the school, agency and state aggregate surveys are not comparable. Enrollment figures represent different things in different states on different surveys. The basis for enrollment must be adequately defined.

- Certain geographic coding schemes in the CCD survey may produce misleading results. With the completion of the school district mapping project, the utility of these codes may be in question.

- The advent of a new period of education reform makes this an opportune time to revisit the structure and content of the CCD survey.

CHAPTER 1. SURVEYS WITHIN SURVEYS

The CCD survey is somewhat unique in that each component is actually a set of several surveys. The respondents for the CCD survey are composed of state and territorial education coordinators. These coordinators obtain their data for submission to the CCD survey by conducting surveys of their own local education agencies. All states have laws that require local education agencies to report data to the state education agency. The collection methods, and content of these data are as diverse as the states themselves.

In order to provide data for the CCD surveys, the states have two basic options. They can take the information they collect from their local education agencies and reformat it for submission to the survey, or they can place this burden on the local education agencies by requiring them to report along CCD survey guidelines. Both of these methods are currently being used, sometimes in combination with each other.

State education agencies which reformat their collected data generally have one individual assigned to the task. This person makes all decisions regarding how state data fit into the various CCD categories. This approach results in within-state consistency, but if an error is made it affects data for all units in the state.

In states where the burden of CCD survey classification is placed on the local education agencies, a potential consistency problem is introduced. In this case, several different individuals interpret CCD definitions. The potential for each individual respondent to have a different interpretation of definitions raises consistency concerns.

Obviously clear, exclusive, exhaustive definitions could result in reduced error in either of these cases. Many states have their own definitions relating to education, and a specific term in one state may mean something completely different in another. This introduces even more potential error as a state could easily make incorrect assumptions about a phrase based upon their own use of the term. This sort of bias can occur using even the best possible set of definitions. Fortunately there are several alternatives for dealing with these types of situations. These options are mentioned only briefly here. Most of them deal with survey methodology and fall outside the scope of this evaluation.

One possible approach is to strengthen the role of the central person responsible for interpreting definitions. This person would communicate with the states to determine exactly what is being included in the data, and would assure that definitions would be universally and consistently applied.

A second alternative would be to set up a series of crosswalks. Many states have their own education definitional and coding schemes. These could be examined and integrated into the CCD framework through the comparison and analysis of state and CCD definitions.

A third approach would be to canvass each education agency and its associated schools separately. With this approach, the survey would not be bound by state definitions, and could use its own definitions exclusively.

A fourth approach might be to poll each state coordinator individually to determine exactly what types of data they can provide. The results of this study could be used to determine a realistic scope for the survey, and to restructure the survey definitions so that they are as universal as possible.

A fifth option is to develop and incorporate a classification *system* into the CCD survey. This system would consist of a set of orderly rules and regulations for classifying agencies, schools, staff, and other survey components. The system could take a linear approach by applying criteria in a step by step process.

The fifth approach would enable either the survey sponsor or the respondents to determine where data should be classified in the overall scheme of things. It would require a set of well written and exhaustive rules which could be applied universally.

The advantage of this system is that aside from the initial effort in developing the system and making initial classifications, there would be very little maintenance. As changes occurred, or as new situations arose, the system could be applied and the data could be classified accordingly. As major changes developed in the area of education reform, the classification system itself could be reviewed and altered if necessary. The reliability of such a system could be easily tested by allowing respondents in states having identical education arrangements in certain areas, to apply the system to their situations. If they

consistently classify data the same way, the system is probably working, if not, the system will require revision.

It is important to stress here that many states, for one reason or other, may not be able to comply with all of the CCD reporting requirements. Practices, procedures, and basic governmental structure may make it difficult or impossible to report according to CCD guidelines.

In order to carry out any of the aforementioned recommendations a thorough understanding of the structure of public education is necessary. Perhaps the best way to understand the structure of public education in individual states and the nation as a whole is to explore its history. The next chapter provides an analysis of how public education evolved in various regions of the country, and where it stands today.

CHAPTER 2. AN HISTORICAL BACKGROUND: ORGANIZING FOR PROVIDING BASIC PUBLIC EDUCATION

The vehicles for providing public education have expanded from the one room school house of the last century to the diverse and complex myriad agencies and services that we find today. Further educational reform such as charter schools, vouchers and telecommunications-based learning will undoubtably continue this trend into the next century. In order to collect meaningful and accurate educational statistics, one must understand the complexities and intricacies of educational service delivery at both the state and local levels.

Fortunately, history provides us with some guidance in this area.[1] Public education in the United States has traditionally been delivered at the local level. Much of the public education in the nineteenth century was built around considerations such as the availability of transportation. Schools had to be within walking or horseback riding distance, and within the reach of several families. Often schools were set up at the township level, but in many cases areas of only a few square miles were formed into school districts. Students were given basic instruction in reading, writing and mathematics. Many students did not go past the elementary grades, but instead went into apprenticeships. Students who desired to continue their education past the eighth grade generally attended academies.

Many children attended public schools, but attendance rates were low as students often took time off to help with agricultural work. While many states passed laws which made the provision of public education mandatory, most children were not required to attend. This began to change during the industrial revolution as many businesses recognized the utility in training children to be eventually integrated into the workforce. During this period there was a large population of immigrants coming into the United States. Many immigrant families preferred to send their children to work to provide increased income. This practice resulted in the passage of many child labor laws and compulsory school attendance laws. Consequently, public education began an expansion.

As technology progressed, so did the need for secondary and postsecondary instruction. A Michigan Supreme Court ruling requiring towns to support public high schools in 1875 opened the door for high school expansion. The number of public high schools in the nation increased markedly in the latter part of the nineteenth century. School systems which did not have the resources to open their own high schools often sent their students to neighboring districts or to private academies in the area. The advent of the motorized vehicles made this increasingly easier. Gradually the demand for high schools outpaced the supply and many districts built their own high schools, pooled with neighboring systems to operate joint high schools, or simply consolidated themselves with districts already operating high schools.

Perhaps the most widely used method for increasing educational resources was consolidation. Since the middle of the twentieth century, school districts have consolidated at a rapid rate. For example, in 1942 108,579 school district governments were reported in operation. In 1992 this number had dwindled to only 14,422.[2,3] Many districts benefitted from this process as the greater tax base enabled them to provide better schooling, build better facilities, hire more teachers and increase educational opportunities for their students.

Consolidations were accomplished through different means in various regions of the country. Many systems which had once been associated with a small unit of local government took on different geographic boundaries.

In the southeast, many states consolidated their school districts at the county level and created larger countywide school systems. School systems existing in urban areas were often allowed to serve the corporate boundaries of a city with the county system

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[1] *Barger, Robert N. <rbarger@sun1.iusb.edu>. "History of American Education Web Project" <http://sun1.iusb.edu/eduweb01/>. 20 April 1997.*

[2] *U.S. Bureau of the Census. Census of Governments: 1962, Vol. I, Governmental Organization. U.S. Government Printing Office, Washington, DC, 1963*

[3] *U.S. Bureau of the Census. Census of Governments: 1992, Vol. I, Governmental Organization. U.S. Government Printing Office, Washington, DC, 1994*

encompassing the balance of the county. The states of Alabama, Florida, Georgia, Kentucky, Louisiana, Maryland, North Carolina, Virginia, and West Virginia conform to this pattern. The states of Mississippi, Tennessee and South Carolina illustrate a consolidation process which started along the same lines, but has yet to be completed.

In the Midwest, many systems which had originally served readily defined geographical boundaries such as those of a township, city or village, now serve several local governments, and in many cases, portions of existing local governments. In states such as Missouri where school districts originally served a portion of a township, many have consolidated into districts which are outside any preestablished political boundaries. While some school districts in the Midwest continue to serve a particular city, township or village, most serve areas which are not coterminous with established local governments.

In New England things have remained relatively unchanged through the period, with the exception of an increase in regional school districts. Education in New England is generally provided through the city or town government. Regional school districts are formed when city and town school systems band together to provide public education. In some cases, the city and town systems give up their individual identities. In other cases, they may retain their identity and provide direct education to certain grade levels, or they may join two or more regional school districts. The latter situation accounts for the unusual agency type codes that some of the New England states report for their school districts. This will be discussed in detail later.

Many school systems in the western states were not originally drawn around existing political boundaries. The vast expanse of land and the sparse population necessitated school districts be formed around population concentrations. Often these areas were not coterminous with any existing local governments. The three notable exceptions to this rule are Nevada, Utah and Wyoming. Every district in Nevada is coterminous with county boundaries (including a district serving the independent city of Carson City). The districts in Utah and Wyoming often serve a single county or city, with a few counties having two or more districts which collectively encompass the entire county. School district consolidations in this region have slowed down markedly in recent years with only Oregon and Montana showing any significant activity.

Other forms of education have had a different evolution. Special, vocational and alternative education all followed different paths. Educational service delivery for these categories has undergone significant change in the last few decades.

Special education was transformed markedly with the passage of what is today known as the Individuals With Disabilities Education Act (IDEA) in 1974[4]. The act literally changed the face of special education in this country. Several states passed legislation giving local school systems the ability to comply with the act. Due to the fact that many of the regulations contained in the act could be expensive to implement, a new breed of agency was introduced in many states. Agencies serving as special education cooperatives allowed local school systems to pool their resources, and comply with the act in a much more efficient and cost-effective manner.

The Carl D. Perkins Vocational and Applied Technology Act[5] which was originally passed in 1963, contained provisions which gave incentives for local education agencies to enter into cooperative arrangements for vocational education. As a result, many school districts have pooled together to form vocational schools. In a few states, separate school districts have been formed to provide vocational education. In other states there is a vocational education system run at the state level.

In most states, constitutional responsibility for providing public education rests with the local school systems. Regional agencies formed to provide special, alternative and vocational education, and related services are often created by local school systems. In a few cases local governments do not have the responsibility for providing public education. These exceptions involve student populations which do not reside in the area covered by local school systems, such as students residing on federal Indian reservations or military bases, children of migrant workers who do not have a permanent residence and some areas which are so sparsely populated that education is provided through the state via correspondence or

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[4] *20 U.S.C. § 1400 (1997)*

[5] *20 U.S.C. § 2301 (1997)*

telecommunications (e.g., Alaska and Maine). Even in cases where students attend statewide special schools, their education is still the ultimate responsibility of the local school system.

Table 2 provides an in depth, state by state look at the agencies which are legally responsible for providing public education. The table also includes some information about the geographic area served by these agencies. Since many public school systems ultimately have their funding rooted in property taxes, geographic area is often a good indicator with regard to responsibility for the provision of education. Even in this age of education reform many of the new types of education delivery are often linked back to the agency legally responsible for education. For example many charter schools have their funding formulas based on the per pupil expenditures of the school systems in which the students reside.

In some states more than one agency may have the responsibility to provide public education in a given geographic area. The most prevalent example can be found in states which have both elementary and high school districts. In these cases one district provides elementary instruction within a given area, and another district provides secondary instruction. Other cases involve the provision of special, or vocational education. For example in the special education districts in the state of Missouri exclusively provide special education services to children within their geographic areas. Existing school systems in the area are prohibited from providing special education where these special education districts exist. Similar situations exist in states like New Jersey where county vocational school districts provide vocational instruction to all pupils in the county.

There is an important distinction that must be made when looking at the agencies listed in Table 2. It should be stressed that all of these agencies are essentially independent of the control of any other education related agency. Thus, while the special school districts in Missouri are included in this table, special education cooperatives in other states are not. This is due to the fact that in most states the special education cooperatives are formed jointly by the agencies which are legally responsible for providing that type of service in the first place. These are generally membership organizations from which a member school system can withdraw at any time, and go back to providing its own services. Conversely the special school districts in Missouri are governed by a board directly elected by the people (see Table 1), and may only be dissolved by the voters. Their operations are completely independent of the local school systems, and once they are formed they are completely responsible for providing special education services for the children residing in their geographic area. This situation also provides a good illustration of how control mechanisms can affect the classification of an agency. Most special education cooperatives are reported as type 4 (regional education service) agencies. This is generally valid as they are, in effect, regional education agencies providing service to their region of membership. The special school districts in Missouri, on the other hand, are reported as type 1 agencies as they are essentially "local school districts."

There are unique situations such as in the states of Massachusetts and Vermont. Many of the towns in Massachusetts do not educate their students directly; rather they form regional school districts with nearby towns to provide basic education. In addition, towns can join two or more regional school districts. For example, a town might join one district for the education of its elementary pupils, another for the education of its secondary students and a third to provide vocational training to its students.

For reporting purposes, Massachusetts reports each individual town as an agency in its own right, even though the town has no school committee or similar entity to provide for the education of its pupils. Each town involved in a regional school district is entitled to representation on the regional school board, and these boards are reported as agencies as well. Enrollment is only reported through the regional districts, not with the member towns.

On the surface, it appears that there is no purpose for reporting these towns on the survey. This approach does have utility on the fiscal side of the survey however, and can potentially be of great significance on the non-fiscal side if the method for defining enrollment were to be changed. On the fiscal side, the reporting of individual towns which do not operate schools of their own allows the tracking of the flow of funds from a town to a regional school district. If enrollment data were added to the mix, then per pupil expenditures and other related data could be calculated in more detail, and with greater certainty. A discussion of enrollment can be found in Chapter 5.

The state of Vermont also reports individual towns which are members of regional (union) school districts. This type of reporting may carry the same significance as that in Massachusetts. Vermont, however, does not report data for the towns which have abolished their school committees and formed unified school districts.

Both Vermont and Massachusetts recognize the town as the basic unit for providing education. Regional agencies provide much of the basic education in both states, but they are not considered to be constitutionally responsible for that service. Rather it is the towns that make up the regional districts which bear this designation.

Other federal grant programs have resulted in the creation and/or modification of various types of agencies and schools. Many of these grants contain their own sets of definitions which may not be consistent with CCD definitions. Such considerations bear careful tracking insofar as they may affect the quality and scope of data on the CCD surveys.

CHAPTER 3. CLASSIFICATION ISSUES

Section 3.0 Scope and Boundaries of the CCD Survey

The CCD subject area encompasses public elementary/secondary education. It shares a boundary with each of two other NCES subject areas, private elementary/secondary education (as measured by the Private School Survey), and postsecondary education (as measured by the Integrated Postsecondary Education Data Surveys). Taken together, these three components comprise the universe of education.

These boundaries are not always clear. For example, there are several privately run schools in the nation that educate publicly funded students under contract with a public LEA. Many high school students attend college classes to supplement their secondary education. These are examples of the boundaries being breached. When situations like this occur, it is important to deal with them in some way. Probably the most effective way is to coordinate the definitions among the three surveys to account for such situations. For example, a student who attended both college classes and secondary classes would be classified either as a college student or a high school student and would, by definition, be covered by only one survey. By the same token, a school which is privately operated but educates public students, would be excluded from the CCD, but included on the PSS.

A second way in which these situations could be handled would be to establish some sort of pro rata scheme, and/or the inclusion and exclusion of selected data items, contingent upon the situation. For example, a student who attended college and high school for half the day could be enumerated as one half of an FTE for both the IPEDS and CCD enrollment counts. Another example would be to exclude public students from the enrollment counts on the PSS survey, and include them with the public agency paying for their education on the CCD survey. A barrier to this approach is that it requires constant monitoring and coordination between surveys, not to mention the potential for increasing respondent burden.

A third approach would be to treat these situations as if they were nonexistent from the data standpoint. For example, a student who attended both college and high school would be reported on both the IPEDS and CCD surveys. If this approach is used however, it is essential to document this practice. This must be acknowledged, at the very minimum, on the survey level, and more desirably, at the unit level. This sort of acknowledgment would allow data users to separate or make important data distinctions, when dealing with any or all of the affected surveys. It would also give respondents much needed guidance on how to handle these situations, and might increase data reliability and validity as well.

Once these boundaries are clarified and the methods for maintaining them have been established, boundary definitions can be formulated. These definitions must be coordinated among all three surveys so as to insure total coverage with the least possible amount of overlap. Definitions of the terms "public," "private," "secondary," "postsecondary" and other boundary related definitions can be formulated.

Section 3.1 What Constitutes an Agency Versus What Constitutes a School?

One of the most fundamental considerations for the CCD survey is the classification of an entity as an agency or a school. The CCD definition of an agency refers to the definition of an "education agency." It reads: "Government agency administratively responsible for providing public elementary and/or secondary instruction or educational support services." Although there is no specific definition for the term "school," the term "public school" is defined as an "Institution that provides educational services, has one or more grade groups (PK-12) or is ungraded, and has one or more teachers to provide instruction; is located in one or more buildings; has an assigned administrator; receives public funds as primary support; and is operated by an education agency."

In this case, the term "agency" is defined using the word "agency." One of the dictionary definitions of the word "agency" is "an administrative unit of government." Perhaps this phrase should be substituted for the word "government agency."

The term "educational support services" is not defined. The terms "elementary" and "secondary" are defined, but their designation is left up to state or local practice. This gives the states a great deal of latitude in their interpretations of the phrase "education agency." This sort of discretion may actually be desirable if it is being exercised by one group or individual with respect to the entire survey. It allows some flexibility, but still

allows criteria to be applied consistently. Unfortunately when this sort of discretion is left to individual survey respondents, it results in different, and inconsistent criteria being applied throughout the survey. This practice inevitably erodes the statistical quality of the survey. In fact, there are several cases of similar entities in individual states being classified quite differently from state to state.

A good illustration of this would be a school for the deaf run by a state department of education. Some states classify schools for the deaf as separate agencies, some classify them as individual schools under the Department of Education (the agency), some classify them as schools within a local education agency, and many others classified them as out of the scope of the survey. It appears that some standards must be formulated and applied here, otherwise the integrity of the survey may be compromised.

Once a clear, concise definition for the term "education agency" is formulated, some criteria for determining the relationship of an agency to a school can be introduced. The current definition of a public school is discussed in Chapter 4. The definition states that a public school must be "operated by an education agency." This suggests that a relationship must exist between a public school and an education agency.

The fact that a school must be operated by an agency suggests a hierarchical relationship. In other words an agency may be able to exist without a school (assuming that the term "educational support services" can encompass instructional services not delivered in a classroom setting and/or noninstructional services), but a school cannot exist without an agency. This criterion appears to be applied consistently throughout the survey as there are no schools which do not have corresponding agencies in the survey.

The problems seem to occur when more than one entity which could potentially qualify as an agency has some sort of charge over an individual school. If a state school for the deaf has a superintendent or board of trustees appointed by a state board of education, it is unclear which body constitutes an agency. If both constitute an agency, then it is unclear as to which agency should the school be assigned. If either the board of trustees or the department of education does not constitute an agency then it is unclear what criteria should be used in making that determination.

The recent charter school movement provides a further illustration of the aforementioned problems. Charter schools almost universally are governed by separate boards. In most cases these boards consist of the trustees of a nonprofit corporation. In some states a local or state education agency may exert limited control over the charter school. In other cases, control is virtually nonexistent aside from the power to revoke the charter. Even when this form of control is present, it is often subject to appeal to other agencies.

The states of Massachusetts and Michigan have been reporting charter schools as agencies unto themselves. The states of California and Colorado have been reporting these schools as components of existing local education agencies. Of the aforementioned, only in the state of Michigan does the local or state education agency exercise significant control over these schools. In Michigan the sponsoring education agency establishes the composition and manner of appointment of the school's board of directors. Conceivably the local or state education agency can directly appoint the members of the charter school's board of trustees. On the other hand, the local education agencies in the states of California, Colorado and Massachusetts have little, if any, control over the composition of the charter school's board, and its day-to-day operations.

There seem to be few guidelines in place for determining whether a charter school constitutes a school, agency or both. Therefore, it is not surprising that the states are using various approaches when reporting these schools.

In the absence of clear and complete guidelines, it would be tempting for a state to classify an entity based upon what would produce the least amount of reporting burden, or beyond that, what would entitle the state to the greatest amount of federal funding.

It is clear that CCD definitions need to provide a comprehensible distinction between a school and an agency. Questions such as "what amount of control must be exerted over the governing body of a school in order for it to be considered part of an agency, or a separate agency in its own right?," and "what relationships must exist between schools and their agencies?," must be addressed. These definitions should be developed so that they cover the many situations in the different states. They should establish clear and concise boundaries between schools and

agencies, and at the same time, account for all possible situations.

Section 3.2 Geographic Implications

Because school district boundaries vary widely, it is often difficult to associate demographic and economic data collected at the level of established geographic entities. School districts often cover portions of existing geographic entities, and may cover all or parts of several areas. School districts often cross county boundaries, and may include areas which are both urban and rural in nature. Data collected at the county, municipal, or even census tract or block level often cannot be directly correlated to existing school district boundaries.

The CCD survey contains elements which were designed to provide a measure of geographic comparability. The locale code in the school universe survey, and the FIPS county, CMSA/PMSA/MSA and metropolitan status codes in the agency universe survey, all contain some level of geographic information. In some states this provides very accurate and comparable geographic information. In other states, the accuracy and validity of the information are in question and can, in some instances, be misleading.

The CMSA/PMSA/MSA codes are all defined by OMB as a federal statistical standard for metropolitan area (MA) designation. The definitions for these components can be rather confusing to the geographic layperson. In simple terms a metropolitan area is defined as either an MSA or a PMSA. PMSAs make up a larger CMSA, but MSAs stand on their own. The formal definitions of each of these components are as follows:

MSA (Metropolitan Statistical Area) - An MSA may be defined in one of two ways namely 1.) A metropolitan area containing a city of at least 50,000 population, or an urbanized area of at least 50,000 with a total metropolitan population of at least 100,000 (75,000 in New England) or, 2.) In addition to the county containing the main place, an MSA may include additional counties that meet specific criteria concerning economic and social ties to the central county. MSA's are defined in terms of counties except in the six New England States where cities and towns (minor civil divisions) are used.[6]

PMSA (Primary Metropolitan Statistical Area) - A PMSA is comprised of one or more counties (cities and towns in New England), within a metropolitan complex having a population of 1,000,000 or more, that demonstrate--based on specific criteria--very strong internal and economic social links separate form the ties to other portions of the metropolitan complex. By definition, a PMSA is always part of a Consolidated Metropolitan Statistical Area (CMSA.)[6]

CMSA (Consolidated Metropolitan Statistical Area) - Where Primary Metropolitan Statistical Areas (PMSA's) are defined, the metropolitan statistical area of which they are a component is redesignated as a consolidated metropolitan statistical area.[6]

In order to accurately interpret these definitions it is necessary to have some general background knowledge in Census and Federal geography.. Understanding of how these terms, and definitions, and other related concepts fit together is paramount for accurate reporting.

For the 1994–95 and prior surveys, this geographical information was collected from the state education agencies. Many of these agencies may be unfamiliar with federal geographic standards and definitions. In recent years this information has been provided by the Census Bureau. This is a significant improvement because the Census Bureau has both the geographical and governmental expertise to assign these codes as accurately as possible. Even so, there are some inherent problems with the coding scheme which must be addressed.

The "**Locale Code**" is a code contained in the school universe survey. This code is intended to provide a geographic classification based on the mailing address of the school. One thing that should be stressed to users of the data is that the demographic characteristics of the area where the school is located do not necessarily reflect the demographic makeup of the student body. Situations such as court ordered desegregation, shared, contractual and regional

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[6] *Definitions extracted from: U.S. Bureau of the Census. A Guide to State and Local Census Geography. U.S. Government Printing Office, Washington, DC, 1993*

services and education for special needs populations, may result in a student body which does not reflect the immediate surroundings of the school. Additionally, some school districts also offer choices to students as to which schools they may attend.

The code itself consists of seven categories: "Large city," "mid-sized city," "urban fringe of a large city," "urban fringe of a mid-sized city," "large town," "small town," and "rural" (see Chart A).

Chart A. Locale Code Definitions

Large City: A central city of a CMSA or MSA, with the city having a population greater than or equal to 250,000.
Mid-size City: A central city of a CMSA or MSA with the city having a population of less than 250,000.
Urban Fringe of a Large City: Any incorporated place, CDP, or non-place territory within a CMSA or MSA of a large city and defined as urban by the Census Bureau.
Urban Fringe of a Mid-sized City: Any incorporated place, CDP, or non-place territory within a CMSA or MSA of a mid-size city and defined as urban by the Census Bureau.
Large Town: An incorporated place or CDP with a population greater than or equal to 25,000 and located outside a CMSA or MSA.
Small Town: An incorporated place or CDP with population less than 25,000 and greater than or equal to 2,500 and located outside a CMSA or MSA.
Rural: Any incorporated place, CDP, or non-place territory designated as rural by the Census Bureau.

Note: In places where the terms CMSA and MSA are used together, the definition can be simplified to read MA. MAs (Metropolitan Areas) are defined by the Office of Management and Budget. The term MA includes both MSAs and CMSAs, and can, therefore, be used in place of these terms.

The geographic detail provided by the locale code is the greatest detail available in the survey. The other geographic codes provide information at a more aggregated level. The FIPS county codes are assigned by the National Institute of Standards and Technology to each county and county area in the United States. The survey guidelines for the submission of this code specify that it should represent the county where the office of the education agency's chief executive officer is located. This provision adequately addresses situations where an agency serves all or parts of two or more counties. While this designation might result in an agency being assigned to a county in which it performs only a small portion of its services, it does provide for a measure of consistency. As long as this policy is documented in data releases, it should not result in data users making incorrect assumptions.

The CMSA/PMSA/MSA codes are assigned by the Office of Management and Budget to provide a specific designation for large urban areas. These areas may cover a single county, two or more counties, or in the New England area portions of one or more counties. Unfortunately there is no definitional guidance for handling agencies which cover areas both inside and outside of a particular metropolitan area, or those which encompass two or more metropolitan areas. Perhaps it would be best to include a component in the definition similar to the component of the FIPS county definition specifying that the code should represent the area where "the office of the education agency's chief executive officer is located."

As a side note, the CMSA code is a two-character code. The PMSA and MSA codes are four character codes. The definitions do not make this distinction. The intent would appear to be that the CMSA code should be entered into the first two characters of the six character CMSA/PMSA/MSA field of the agency survey, and that the PMSA/MSA code should be entered into the last four characters of the field, but this is not clearly communicated.

The Metropolitan Status Code is similar to the locale code in that it takes existing geographical conventions, and integrates them into a unique coding scheme. The definition of the Metropolitan Status Code is as follows:

> "Metropolitan Status Code is the classification of an education agency's service area relative to a Metropolitan Statistical Area. The agency classifications are: (1) Primarily serves a central city of an MSA; (2) Serves an MSA but not primarily its central city; or (3) Does not serve an MSA."

The third component of this definition is self evident. An education agency either serves an MSA or does not. The first two components are differentiated based on service, but it is not clear whether the term "primarily serves" is linked to population or

geography. That is an agency could serve a much larger geographic area outside of a central city, but still serve more people within the central city than outside of its boundaries. If the geographic service area is intended to be the primary measure then such an agency would be coded as a "2," while if population was to be the primary factor, then the agency would be coded as a "1."

Many school districts defy standard geographic conventions. This often makes it difficult for researchers and analysts to make meaningful comparisons of school data on a geographic level. Fortunately, school district boundaries are now integrated into the Census Bureau's TIGER mapping system. Data sets which have detail down to the census block level can now be used for school district analysis. The system is not perfect however, since some school district boundaries contain only a portion of a census block. Even so, the level of detail available makes comparisons much more reliable than in the past.

Section 3.3 A Question of Enrollment

Perhaps the most critical data collected through the CCD survey is student enrollment. This information is used in a broad range of decision-making processes at many levels. In theory, the total enrollment of individual schools which comprise an agency should equal the total enrollment for the agency.

However, the enrollments of 1,480 agencies did not equal the enrollment totals of their schools aggregated up. Out of this number, 686 agencies showed a lower total enrollment than their component schools, and 794 agencies showed a higher level of enrollment than their associated schools.

A possible explanation for this would include students who are "tuitioned out" from one agency to another. In this case, a student might show up in the enrollment count of the school for the receiving agency, but also show up in the enrollment count for the sending agency.

In order to test this theory, school enrollments were compared to agency enrollments at the state aggregate level. If "tuitioning out" students was the cause of the individual agency discrepancies, then it would stand to reason that everything would balance out at the state level. This was not the case: 48 states and territories had total agency enrollments which did not match the enrollments of their schools. In some cases these enrollment totals differed by 25 percent or more.

One approach to solving the apparent enrollment problem would be to specifically define agency and school enrollments: enumerate actual school attendance figures at the school level, and also enumerate the number of students for which an individual agency is legally responsible at the agency level. This would lead to two distinct enrollment figures which would provide the information needed by researchers and policy analysts.[7]

The following are two examples of how this sort of an enrollment collection could be utilized:

1. An agency operates no schools, but sends its students to neighboring education agencies along with tuition payments. A researcher desires to calculate the agency's per pupil expenditure.

   Under current collection practices the researcher would arrive at a figure of infinity as the enrollment of the agency would be zero and would be divided into the total expenditures of the district. If the agency enrollment was defined as "the number of students for which an education agency is legally responsible for providing education," then the agency enrollment figure would represent all of the students tuitioned out by the district, and a meaningful per pupil expenditure could be obtained.

2. A researcher wants to know if the overall pupil teacher ratio varies from the pupil teacher ratio for special education within a particular state.

   Special education in the state is delivered through regional special education agencies. These agencies operate schools on behalf of member school districts. They employ their own staff, but are not legally responsible for educating any

[7] A similar approach would probably work well with staffing statistics. Staffing data could be collected differently on both the school and agency levels. Staff actually employed by an agency could be assigned to the agency. Staff working in a school could be reported at a school level regardless of who the ultimate employer is.

students. All students are sent from feeder districts. Theoretically, the overall pupil/teacher ratio for a state can be obtained by dividing the sum of the enrollment of all education agencies in the state by the sum of all teachers employed by the education agencies within a state. This cannot be done to enumerate the pupil/teacher ratio for special education in the state. Because the special education agencies are not legally responsible for educating students, their enrollments would be zero. Attempting to calculate a pupil/teacher ratio would result in a figure of zero or infinity depending upon whether any teachers were employed by the agency. Therefore, a meaningful pupil/teacher ratio for special education in the state would have to be performed at the school level. In this case the researcher could sum the totals of all the schools which are being run by the special education agencies, and then use these figures to calculate an accurate pupil teacher ratio for special education. The enrollment reported by the individual schools would consist of students who had been assigned to other education agencies, but who had not been counted in any other schools.

It would appear to be a relatively simple matter for local education agencies to be able to report the actual enrollment for which they are legally responsible. There may be some problems, however, in reporting actual school enrollment. This is especially the case when a student attends more than one school simultaneously. In such cases, guidelines must be established to address this situation. Possible solutions range from calculating a student full-time equivalency to assigning a student to one of the schools exclusively based on clear guidelines.

CHAPTER 4. CLASSIFICATION AND DEFINITIONS: CONSIDERATIONS FOR SETTING STANDARDS

The purpose of the Public Elementary/Secondary Education Agency Universe Survey is twofold: "To provide a complete listing of every education agency in the country responsible for providing free public elementary/secondary instruction, or education support services," and "to provide basic information for all education agencies and the students for whose education the agencies are responsible."

An analysis of the first component of the purpose "to provide a complete listing . . . " has been previously addressed in "*Coverage Evaluation of the 1994–95 Common Core of Data Public Elementary/Secondary Education Agency Universe Survey*[8]."

The second component of the purpose suggests the intent to collect basic information for the students for whose education the agencies are responsible. Chapter 2 and Table 2 attempt to clarify which agencies in a particular state are legally responsible for providing public education to students.

In order to establish standards and insure that the information collected is comparable at the state, local, and national levels, it is recommended that a set of definitions be developed that can be universally applied. These definitions should be flexible enough to allow for the various anomalies among the states, yet specific enough to allow data to be compared at all levels. Otherwise the individual states are making the determination as to what is and is not included in CCD categories. This limits the comparability of the information. This also makes it difficult for the end user to know exactly what is included in the data, and makes national comparisons all but impossible.

Some local education agencies were formed specifically to provide a vehicle through which existing local education agencies could adhere to federal regulations, and/or be eligible for federal funding. Agencies which provide special and vocational education were often created for these purposes. It might be a prudent practice to use official federal definitions when they are available and applicable. This becomes even more advisable when the allocation of federal funds is based, at least in part, on the results of the CCD survey. There are many Federal grant programs which use the CCD survey, at least in part as a basis for allocation. One approach might be to examine and explore all federal definitions applying to education, and then formulate a set of revised definitions which adequately address a majority of federal education programs.

Many education surveys use CCD as their basis. It is important to get feedback from the administrators of each of these surveys. Questions on how they use the CCD survey, what problems they have encountered in the past, and how the survey could better serve their needs, should be posed to survey administrators. This sort of feedback can assist in the process of revision of survey definitions.

Equally important is to get feedback from the survey respondents and data users. These groups should be given the opportunity to inquire about issues relating to survey coverage and definitions.

The goal of the CCD is to serve as a comprehensive and accurate database for all public elementary/secondary education in the United States. This cannot be achieved without having a sound foundation on which to build. Inconsistencies, inaccuracies and omissions from the survey potentially cause problems to users at all levels. These sorts of problems can have a "trickle down" effect when the survey is used as a basis for other surveys. Ironically, this situation can result in the omission or misclassification of entities which funding was intended to benefit.

Good foundations are built upon definitions which are accurate, exhaustive and exclusive. Systems built on these principles tend to stand the test of time. The system should not be so rigid as to be impossible to apply to unique situations or to handle evolving trends, yet it should not be so flexible as to allow for overlap and inconsistency. If these principles are applied, the CCD survey can serve as a national standard for public education statistics.

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[8] *Owens, Stephen "Coverage Evaluation of the 1994–95 Common Core of Data, Public Elementary/Secondary Education Agency Universe Survey", U.S. Department of Education, National Center for Education Statistics (97-505).*

The following is a definition-by-definition analysis describing potential classification or definitional issues:

Section 4.1 Geography

Geographic Definitions (Central City, CMSA, Large City, Large Town, Metropolitan Status, Metropolitan Areas, Metropolitan Statistical Area, Mid-size City, Non-MSA City, Primary Metropolitan Statistical Area, Rural, Small Town, Urban Fringe of a Large City, Urban Fringe of a Mid-size City)

At the time of the 1994–95 CCD surveys the data for these elements were supplied by the respondent. In subsequent years the Census Bureau has gradually become responsible for reporting these elements, because the Bureau has a set of standardized definitions which can insure that accurate information is provided for geographic characteristics.

A separate discussion of geography, and how it relates to agency boundaries, can be found in Chapter 3.

Section 4.2 Race/Ethnicity

Racial/Ethnic Categories (American Indian, Alaskan Native, Asian/Islander, Black, Hispanic, White)

The most important thing to keep in mind with these types of definitions is that they should follow established guidelines. It appears that OMB guidelines were followed when these definitions were formulated, however, new OMB guidelines may be more difficult to follow.

Section 4.3 Schools and Agencies

Alternative Education School: "A public elementary/secondary school that: Address needs of students that typically cannot be met in a regular school, provides nontraditional education, serves as an adjunct to a regular school, or falls outside the categories of regular, special education, or vocational education."

This definition is worded in a way that would suggest an alternative education school must have one of the four components set out in the definition. Therefore, if any one, or any combination of these four criteria are met, the school would qualify as an alternative education school.

The second phrase "provides nontraditional education" creates an interpretation problem. Nowhere in the CCD glossary is the term "nontraditional education" defined. It is unclear whether this phrase refers to experimental teaching methods, education in nontraditional settings, or nontraditional service deliveries such as charter schools. Unless the phrase "nontraditional education" is clearly defined, this element is subject to the interpretation of the respondent, and as such, can result in incomparability across states. It might be a good idea to list specific examples with this component of the definition.

The phrase "serves as an adjunct to a regular school" can be confusing. It is unclear how an adjunct of a school can constitute a school in its own right. If this phrase is intended to address situations where two schools occupy the same physical space, then that should be clearly stated.

Education Agency: "Government agency administratively responsible for providing public elementary and/or secondary instruction or educational support services."

The term "government" is vague. Some of the agencies reported on the CCD survey are in fact, private, nonprofit corporations and/or religious institutions.

The phrase "administratively responsible" must be clarified. It could mean "statutorily or legally responsible," or belonging to some agency.

The phrase "educational support services" is not defined. The interpretation of this phrase is critical to the composition of the agency universe. Respondents need instructions as to what constitutes other educational support services, in order to accurately and consistently report these types of agencies on the survey.

The National Education Statistics Act of 1994[9], which reauthorized the existence of the National Center for Education Statistics, contains a definition of the term

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[9] *20 U.S.C. § 4001 (1997)*

"local education agency." The definition reads as follows:

a. "The term "local educational agency" means a public board of education or other public authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public elementary or secondary schools in a city, county, township, school district, or other political subdivision of a state, or for such combination of school districts or counties as are recognized in a state as an administrative agency for its public elementary or secondary schools.

b. The term includes any other public institution or agency having administrative control and direction of a public elementary or secondary school.

c. The term includes an elementary or secondary school funded by the Bureau of Indian Affairs but only to the extent that such inclusion makes such school eligible for programs for which specific eligibility is not provided to such school in another provision of law and such school does not have a student population that is smaller than the student population of the local educational agency receiving assistance under this Act[10] with the smallest student population, except that such school shall not be subject to the jurisdiction of any State educational agency other than the Bureau of Indian Affairs."

The CCD survey definition of an education agency incorporates some, but not all of the elements in this definition. Perhaps a derivative of this definition could be used in the CCD survey.

The definition of an education agency provides the basis for the CCD agency universe. It could be restructured so that all states will have clear guidelines as to what they should be reporting.

Federally Operated Education Agency: "Federally operated agency charged at least in part with providing elementary and/or secondary instruction or support services."

There is nothing inherently wrong with this definition per se, but state education agencies may be unable to provide data for federal programs for which they have no jurisdiction. Agencies like the Department of Defense (domestic military base schools), the Bureau of Indian Affairs (BIA schools), and the Department of Labor (Job Corps programs) should be contacted directly to report data for the survey. A good illustration of the need for direct reporting can be found in the Schools and Staffing Survey (SASS.) The public portion of the SASS is based on CCD. The inability of state coordinators to report BIA schools on the CCD survey has necessitated that the BIA school universe for the SASS survey be obtained directly from the Bureau.

Operational Status: "Classification of the operational condition of a school. Classifications include currently operational, closed, and opened."

This definition is the basis for the operational status code which is included in much greater detail in the instructions for completing the School Universe Survey. It would also be helpful to add an operational status code to handle situations where a school closes for a year or two for purposes of renovation, asbestos removal, etc.

The definition is also apparently the basis for the boundary change code in the Agency Universe Survey.

Public School: "Institution that provides educational services, has one or more grade groups (PK-12) or is ungraded, and has one or more teachers to provide instruction; is located in one or more buildings; has an assigned administrator; receives public funds as primary support; and is operated by an education agency."

There are several potential problems with this definition. The term "educational services" is not defined. This point might be moot if it is determined that the provision of one or more grade groups is sufficient to satisfy this criterion. If this is the case then the phrase "provides educational services" should be removed. If this is not the case then the phrase "educational services" must be defined.

With recent innovations in education and technology, it is now possible to have schools without buildings. If the phrase "is located in one or more buildings" is

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[10] *20 U.S.C. § 6301 (1997)*

interpreted literally, then schools which provide distance learning, through correspondence, telecommunication, or the Internet could be potentially excluded from this definition.

Some school districts send some or all of their students to private schools which are administered by private and/or religious organizations. In such cases the school district pays a per pupil fee to the receiving private school to educate its students. Some of these private schools have been reported on the CCD survey.

The criterion of being "operated by an education agency" requires clarification. For instance, charter schools in Colorado are operated by the board of trustees of a nonprofit corporation, yet they are reported as a school within an existing school district which does not directly operate the charter school. It is unclear whether these types of entities should be included within an existing education agency that exercises little control over them, or have a separate agency record be created for them. Furthermore, it is questionable whether nongovernmental entities should be included in the survey at all.

Regional Education Service Agency (RESA): "Agency providing services to a variety of local education agencies, or a county superintendent serving the same purposes."

This definition requires several clarifications. The word "services" needs some sort of modifier to be construed as liberally as possible.

The word "variety" should probably be eliminated. It suggests that a RESA must provide services to several different types of education agencies.

The phrase "or a county superintendent serving the same purposes" might be better stated as "a county superintendent performing the same functions."

Regular School: "A public elementary/secondary school that does not focus primarily on vocational, special, or alternative education."

Since the definitions of vocational, special and alternative education are stated specifically in the glossary, this definition would appear to be exhaustive and exclusive.

School District: "An education agency or administrative unit that operates under a public board of education."

The question here is "what constitutes a public board of education?" The definition needs to indicate whether the board of education is accountable to the public through popular election or appointment by elected officials, or whether the board need not be chosen by the public, but must be publicly accountable in some way, or whether this merely refers to a board of trustees which receives public funding. If the intent of the definition is to include the latter, then there are several boundary issues with the PSS that must be further explored, and defined.

Special Education School: "A public elementary/secondary school that: Focuses primarily on special education, including instruction for any of the following: hard of hearing, deaf, speech-impaired, health-impaired, orthopedically impaired, mentally retarded, seriously emotionally disturbed, multi-handicapped, visually handicapped, deaf and blind; and adapts curriculum, materials or instruction for students served."

This definition consists of numerous terms which could possibly be streamlined. The conditions cited may not be mutually exclusive and exhaustive. The key to this definition is the focus on special education, and the adaptation of services to cater to these special needs populations. It would be advisable to do some research into the different terms used by states to describe some of these conditions, and then incorporate them into a concise, but all-encompassing definition.

Another consideration that many states have their own definitions of the term "special education." Some states include gifted and talented students, or students in juvenile custody in this category. Since these situations are not specifically addressed in any CCD definitions, it is probable that various states are including the latter two groups in virtually any category. Therefore, the definitions of "alternative," "special," "vocational," and "regular" education should be reworked so that they account for all possible situations and give the states clear guidelines on where to categorize students.

The federal definition of the term "special education" contained in the Individuals with Disabilities Education Act (IDEA)[11] reads:

> "The term **"special education"** means specially designed instruction, at no cost to parents, to meet the unique needs of a child with a disability, including--
>
> a) instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and
>
> b) instruction in physical education."

Perhaps this definition, or portions thereof, could be incorporated into the definition of "special education school."

State Education Agency: "The agency of the state charged with primary responsibility for coordinating and supervising public instruction, including the setting of standards for elementary and secondary instruction programs."

In some states, responsibility for these tasks is divided between two or more agencies and/or individuals.

The use of the term "state" should be modified so that the District of Columbia, and the outlying territories are included in the definition.

State-Operated Agency: "An education agency or program operated by a state/territorial government. Examples include elementary/secondary programs operated by the state for the deaf or blind; and programs operated by state correctional facilities."

This is a good definition that includes examples. Perhaps some additional examples could be used. For instance, most states have a department of mental health and retardation which operates hospital schools. Also, several states have established magnet schools for math and sciences and for the arts. This area is frequently under-reported so the use of additional examples in the definition might be beneficial.

Supervisory Union: "An education agency where administrative services are performed for more than one school district by a common superintendent."

No definition of the term "administrative services" is given. However, the intended substance for this definition is probably contained under the definition of the term "school administrators." In some cases this function can be performed in the absence of an actual agency. For instance, one person (i.e., county superintendent) can perform these services. It is unclear whether a single person could constitute an agency. Several states have county superintendents or similar offices which provide services to school districts, yet the majority of these states are not reporting these officers as agencies. Finally, it is unclear whether the phrase implies some sort of control or oversight.

Vocational Education School: "A public elementary/secondary school that focuses primarily on vocational education, and provides education and training in one or more semi-skilled or technical operations."

The term "vocational" is used in the definition of a "vocational education school" although the term is not defined separately elsewhere. The definition would be better written as "A public elementary/secondary school that focuses on, and provides education and training in, one or more semi-skilled or technical operations." It may be desirable to expand upon the terms "semi-skilled" and "technical," or as an alternative add some more descriptive terms.

The federal definition for the term "vocational education" contained in the Perkins Act reads:

> The term **"vocational education"** means organized educational programs offering a sequence of courses which are directly related to the preparation of individuals in paid or unpaid employment in current or emerging occupations requiring other than a baccalaureate or advanced degree. Such programs shall include competency-based applied learning which contributes to an individual's academic knowledge, higher-order reasoning, and problem-solving skills, work attitudes, general employability skills, and the occupational-specific skills necessary for economic independence as a

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[11] *20 U.S.C. § 1400 (1997)*

productive and contributing member of society. Such term also includes applied technology education.

Perhaps this definition, or portions thereof, could be incorporated into the definition of "vocational education school."

Section 4.4 **Staffing Categories**

Staffing categories should be mutually exclusive, but need not be exhaustive depending upon the purpose of the survey. Many states have their own personnel classification systems which may or may not be compatible with the CCD staffing categories. Because of this staffing definitions should be as clear and inclusive as possible.

All Other Support Staff: "Support staff not reported in other categories, such as, data processing, health, plant and equipment maintenance, bus drivers, security, and food services workers."

Other Support Staff: "All education agency support services staff not reported in other categories, (e.g., data processing, health, building, and equipment maintenance, bus drivers, security, and food service workers)."

It is not clear why these two definitions coexist. The two are virtually identical, except for the designation of agency staff in the latter definition. The definition "other support staff" does not appear to be used in any of the surveys.

More examples should be used in this definition. There are no definitions of the term "support staff."

Elementary Guidance Counselors: "Professional staff assigned specific duties and school time for any of the following activities in an elementary setting: Counseling with students and parents; consulting with other staff members on learning problems; evaluating student abilities; assisting students in making educational and career choices; assisting students in personal and social development; providing referral assistance; and/or working with other staff members in planning and conducting guidance programs for students. The state should apply its own standards in apportioning the aggregate of guidance counselors/directors into the elementary and secondary level components."

The main defect of this definition is the phrase "The state should apply its own standards in apportioning the aggregate of guidance counselors/directors into the elementary and secondary level components." Again, this allows the state to set its own standards as to what constitutes elementary versus secondary, and renders comparisons across states meaningless.

Elementary Teachers: "Teachers of a general level of instruction classified by state and local practice as elementary and composed of any span of grades not above grade 8. *Exclude Pre-kindergarten and kindergarten teachers.*"

As noted above, the term "classified by state and local practice" is problematical.

FTE (Full Time Equivalency): "Amount of time required to perform an assignment stated as a proportion of a full time position, and computed by dividing the amount of time employed by the time normally required for a full time position."

The lack of specificity of this definition may hinder staffing data research and analysis because no definition is provided for the term "full time position." One state may classify a full time position as six hours per day, and another may classify it as eight hours per day. It would also be an improvement if every data item which was subject to a reference date had the date specified along with the description of the item.

Instructional Aides: "Instructional aides are staff members assigned to assist a teacher in activities requiring minor decisions regarding students, and in such activities as monitoring, conducting rote exercises, operating equipment and clerking. *Includes only paid staff, and excludes volunteer aides.*"

This definition should stress that instructional aides are staff that only assist teachers in facilitating instruction in the classroom setting and that they do not provide direct instruction to students. The category should explicitly exclude other support staff who perform support services.

Instructional Coordinators and Supervisors: "Staff supervising instructional programs at the school

district or subdistrict level. Includes curriculum coordinators or supervisors and in-service training staff; Chapter 1 supervisors; home economics supervisors; educational television staff; coordinators and supervisors of audiovisual services; and staff engaged in development of computer-assigned instruction. *Excludes school-based department chairperson.*"

The terms "instructional programs" and "department chairpersons" are not defined in the glossary. The term "Chapter 1 supervisors" refers back to a federal statute, and must be monitored for changes.

It might be a good idea to use a comprehensive set of examples which would accommodate all respondents.

Kindergarten Teachers: "Teachers of a group or class that is part of a public school program and is taught during the year preceding the first grade."

The existence of ungraded classes necessitates a clarification of, or addition to this definition.

Local Education Agency (LEA) Administrative Support Staff: "Staff members who provide direct support to LEA administrators, *including secretarial and other clerical staff.*"

This definition relies on the accuracy of the definition of "local education agency administrators."

Local Education Agency (LEA) Administrators: "Local education agency superintendents, deputy and assistant superintendents, and other persons with district-wide responsibilities such as business managers and administrative assistants. *Exclude supervisors of instructional or student support staff.*"

A more exhaustive set of examples is needed here. For instance, it is unclear whether school board members are included in this definition. No provision is made for LEA administrators who serve dual roles, and might fit into more than one category.

Librarians and Media Specialists: "Professional staff members and supervisors who are assigned specific duties and school time for professional library and media service activities (including selecting, acquiring, preparing, cataloging, and circulating books and other printed materials; planning the use of library and media services by students, teachers and other members of the instructional staff; and guiding individuals in their use of media services and library materials, whether maintained separately or as part of an instructional materials center)."

Given that many schools now have Internet access, this activity should be addressed under library services, or in another appropriate place. An exact definition of "media services" is needed.

Library and Media Support Staff: "Staff members who render other library or media services, such as preparing, caring for, and making available to members of the instructional staff the equipment, films, filmstrips, transparencies, tapes, TV programs, and similar materials (whether maintained separately [or] as part of an instructional materials center.)"

There is no specific differentiation between "library and media specialists" and "library and media support staff," with the exception of the former being designated as professional staff. It is unclear whether the terms "professional staff" and "support staff" mutually exclusive. If it is determined that these two terms are exclusive, then they require corresponding definitions. This definition should contain a comprehensive and updated set of examples.

Media Specialists: "Directors, coordinators, and supervisors of media centers (see librarians and media specialists.)"

This definition appears to be redundant or combined with the definition of "librarians and media specialists." If this definition is truly separate, a detailed explanation of how it constitutes its own category must be provided.

Prekindergarten Teachers: "Teachers of a group or class that is part of a public school program and is taught during the year or years preceding kindergarten; includes teachers of Head Start students if part of (the word "an" should probably be inserted here) authorized public education program."

If the kindergarten age is universal among all states then this category may be statistically comparable across states, otherwise comparisons are of limited value. One possible problem may involve the perception of teaching and instruction at this age

versus supervision. It is unclear whether the children in these programs must be receiving instruction, or merely receiving supervision.

School Administrative Support Staff: "Persons whose activities are concerned with support of the teaching and administrative duties of the office of the principal or department chairpersons, *including clerical staff and secretaries.*"

This definition needs to clarify the difference between an instructional aide in the classroom and someone who was assisting a principal directly in the classroom.

School Administrators: "Staff members whose activities are concerned with directing and managing the operation of a particular school. Includes: Principals, assistant principals, and other assistants; persons who supervise school operations, assign duties to staff members, supervise and maintain the records of the school, and coordinate school instructional activities with those of the education agency; and department chairpersons."

The difference between this category and that of "local education agency administrators" when an agency has one school is problematic and needs to be addressed.

Secondary Guidance Counselors: "Professional staff assigned specific duties and school time for any of the following activities in a secondary school setting: Counseling with students and parents; consulting with other staff members on learning problems; evaluating student abilities; assisting students in making educational and career choices; assisting students in personal and social development; providing referral assistance; and/or working with other staff members in planning and conducting guidance programs for students. The state should apply its own standards in apportioning the aggregate of guidance counselors/directors into the elementary and secondary level components."

This definition is well written in that it specifically states the various duties associated with the position and provides that any, or all of these duties may be present.

The main downfall of this definition is the phrase "The state should apply its own standards in apportioning the aggregate of guidance counselors/directors into the elementary and secondary level components." Again, this logic allows the state to set its own standards as to what constitutes elementary versus secondary, and makes comparisons across states meaningless.

Secondary Teachers: "Teachers of a general level of instruction classified by state and local practice as secondary and composed of any span of grades beginning with the next grade following the elementary grades and ending with or below grade 12."

This definition uses the term "classified by state and local practice." This creates comparability problems as mentioned previously.

Student Support Services Staff: "Professional and supervisory staff providing noninstructional services to students. Includes attendance officers; staff providing health, psychology, speech pathology, audiology, or social services; and supervisors of the preceding staff and of health, transportation, and food service workers."

There should be some differentiation between this type of staff, and school and agency administrative support staff.

Teacher: "A professional school staff member who instructs students and maintains daily student attendance records."

The function of maintaining attendance records is often not a function of a teacher. This phrase may be extraneous, and if so, should be removed.

Teachers of Ungraded Classes: "Teachers of classes or programs to which students are assigned without standard grade designation."

Some states may have specific alternative grading systems, for example a system which has grades, but not along the standard lines. The term standard grade designation is not defined, however, in keeping with the definitions of the terms "elementary" and "secondary" it would appear that this definition is intended to be left up to the states. If this is the case then the existence of this category may further affect the validity of staffing counts and categories.

Total Full-time Equivalent (FTE) Guidance: "Sum of both elementary and secondary FTE guidance counselors."

The collection of this item appears to place an unnecessary burden on the respondent since all the portions of this total are collected as separate items. This item should only be used in cases where respondents cannot report detail, but only total. If all respondents can report detail, then this field should be calculated from collected data, rather than enumerated as a separate item.

Total Full-time Equivalent (FTE) Teachers: "Sum of all reported teacher FTE's."

The collection of this item appears to place an unnecessary burden on the respondent since all the portions of this total are collected as separate items. This item should only be used in cases where respondents cannot report detail, but only total. If all respondents can report detail, then this field should be calculated from collected data, rather than enumerated as a separate item.

Section 4.5 Students, Student Programs, and Educational Attainment

Diploma, High School: "Formal document certifying the successful completion of a secondary school program prescribed by the state agency or other appropriate body."

This definition appears to be solid. It might be a good idea to query the respondents to determine if there are any types of vocational, or other certificates which might be the equivalent of a diploma (perhaps a state or district-approved educational program mentioned in the definition of Dropout below), but might fall outside this definition for one reason or another.

Dropout: "A dropout is a student who: Was enrolled in the school at some time during the previous school year; was not enrolled at the beginning of the current school year; has not graduated from high school or completed a state or district-approved educational program; and does not meet any of the following exclusionary conditions: 1) Has transferred to another public school district, private school, or state- or district-approved educational program; 2) is temporarily absent due to suspension or school-approved illness; or 3) has died."

This appears to be a fairly comprehensive definition. The only points which could use some clarification are school-approved illness and state or district approved education program for which there are no definitions.

Elementary: "General levels of instruction classified by state and local practice as elementary, that is composed of any span of grades not above grade 8. Preschool or kindergarten instruction is included only if these programs are an integral part of an elementary school or a regularly established school system."

This definition contains the phrase "classified by state and local practice as elementary." This element impedes use of the survey as a national reference in the area of elementary education. It affects comparability between states and may also hinder comparisons between individual agencies within the same state. As a result, this may limit the use of the CCD survey to researchers and policy analysts. In this connection, it should be noted that the SASS, which is based on the CCD survey, collects its own counts of teachers and students. These counts and the associated data presentations are based on a formula which the SASS uses to designate the categories of elementary and secondary. This formula is based on grade level, and is both exclusive and exhaustive. Perhaps this sort of formula could be used in the CCD survey.

Free Lunch Program: "A program under the National School Lunch Act that provides cash subsidies for free lunches to students based on family size and income criteria."

This definition relies on federal legislation in much the same way as the racial and ethnic definitions.

General Education Development Test (GED): "Comprehensive test used primarily to appraise the educational development of students who: Have not completed their formal high school education, and may earn a high school equivalency certificate through achievement of satisfactory scores."

As this definition relates to a widely recognized and specific test there should be no inherent problems with it. The only areas worth exploring would be situations,

if any, where certain states might have their own equivalent of the GED.

Graduate, High School: "Individual who has received formal recognition from school authorities, through the granting of a diploma, for completing a prescribed course of studies at the secondary level school. **Does not include other high school completers, high school equivalency recipients, or other diploma recipients.**"

This definition is solid in that many of the terms used in it have supporting definitions contained in the glossary. Assuming that the terms referenced in this definition are defined adequately elsewhere, there is probably no need to change this definition.

Head Start Program: "A federally funded program that provides comprehensive educational, social, health, and nutritional services to: Low-income preschool children and their families, and children from ages 3 to school entry age (i.e. the age of compulsory school attendance). Head Start students and teachers are reported on the CCD only when the program is administered by a local education agency."

As with Race/Ethnic and Free Lunch definitions, this definition should be routinely monitored and altered to reflect changes in the federal law.

This definition is not referenced anywhere else in the definitional framework. Because of this, schools operating Head Start programs have been classified as regular, special, and alternative education schools by different states. Some mention should be made of how Head Start programs are to be reported. Guidelines should be provided either within this definition, or within the definitions of regular, special or alternative education.

High School Completion Count: "A count of graduates and other high school completers including regular diploma recipients, other diploma recipients, other high school completers, and high school equivalency recipients (State Nonfiscal Survey only)."

This definition is well written and exhaustive.

High School Equivalency Certificate: "A formal document certifying that an individual met the state requirements for high school graduation equivalency by: Obtaining satisfactory scores on an approved examination, and meeting other performance requirements (if any) set by a state education agency or other appropriate body."

This definition implies that in some states passage of the GED test may satisfy this requirement. In order to insure that this is conveyed, it is recommended that a phrase to the effect of "such as the GED" be added after the term "approved examination."

High School Equivalency Recipients: "Individuals age 19 years or younger who received a high school equivalency certificate during the previous school year or subsequent summer."

It is unclear from this definition whether the intent is that an individual receiving the certificate be 19 years or younger at the time of receiving the certificate, or at the time of the survey response. This could be clarified by rewording the definition: "Individuals who, prior to their 20th birthday, received a high school equivalency certificate during the previous school year, or the summer immediately following the previous school year."

Individualized Education Program: "As used here, refers to written instructional plan for students with disabilities designated as special education students under the Individuals With Disabilities Education Act (IDEA-Part B) which includes: Statement of present levels of educational performance of a child; statement of annual goals, including short-term instructional objectives; statement of specific educational services to be provided and the extent to which the child will be able to participate in regular educational programs; projected date for initiation and anticipated duration of services; and appropriate objectives, criteria and evaluation procedures and schedules for determining, on at least an annual basis, whether instructional objectives are being achieved."

This is another definition which relies on a federal statute. As with similar definitions it should be routinely monitored and updated for changes in the law.

Kindergarten: "Group or class that is part of a public school program, and is taught during the year preceding first grade."

If the term "first grade" were universal, this definition would be fine. The existence of ungraded classes necessitates a clarification of, or addition to this definition.

Membership Count: "Total student enrollment on October 1 (or the closest school day to October 1) for all grade levels and ungraded pupils. *Include students both present and absent on the measurement day.*"

To insure absolute comparability the definition should read "the closest school day before October 1", or "the closest school day after October 1."

Other Diploma Recipients: "Individuals who received a diploma from other than a regular school program during the previous school year, and subsequent summer school."

The term "regular school" is defined in the glossary making this a complete definition within the constraints of the referenced definition.

Other High School Completers: "Individuals who received a certificate of attendance, or other certificate of completion, in lieu of a diploma during the previous school year, and subsequent summer school."

The terms "certificate of attendance" and "certificate of completion" are not defined in the glossary.

Prekindergarten: "A group or class that is part of a public school program, and is taught during the year or years preceding kindergarten."

A reference to Head Start might be in order here. Otherwise, this is a clear definition.

Regular Diploma Recipients: "Graduates who received a regular diploma during the previous school year and subsequent summer school."

This definition might be referenced back to the definition of a "High School Diploma." It would appear that the phrase "Regular Diploma" is intended to be synonymous with "High School Diploma." If it is not, then it should be defined.

Secondary: "General level of instruction classified by state and local practice as secondary and composed of any span of grades beginning with the next grade following the elementary grades, and ending with or below grade 12."

As with the previous definition of "elementary" the phrase "classified by state and local practice" undermines statistical comparability.

Student: "Individual for whom instruction is provided in an elementary or secondary educational program under the jurisdiction of a school, school system, or other educational institution."

The key here is an individual who receives instruction. The use of the term "educational institution" is probably undesirable here as it would tend to exclude entities like department of corrections schools where education is not the primary purpose. Also, there is no formal definition of the term "educational institution."

Ungraded: "Classes or programs to which students are assigned without standard grade designation."

This definition can encompass a broad area. The definition is good assuming that recoding of reported data into existing grade categories is undesirable. However, there may be a problem with the term "standard grade designation." Some states may have specific alternative grading systems, for example a system which has grades, but not along the standard lines. The term standard grade designation is not defined, however, in keeping with the definitions of the terms "elementary" and "secondary" it would appear that this definition is intended to be left up to the states. If this is the case then the existence of this category may further affect the validity of student counts.

Section 4.6 Recommendations

If survey definitions are revised, they should be done so with a goal of being flexible, exhaustive (i.e., covering all possible situations in every state), and mutually exclusive (i.e., definitions should not overlap.) Examples should be used to illustrate and clarify definitions.

Definitions should also be structured with the establishment of a national standard in mind. This practice will enable researchers to produce valid and relevant statistical studies, and will allow policy

makers to make decisions based on sound and accurate information.

When revising definitions the user must be taken into consideration. A state data coordinator is much less likely to read and understand an excessively lengthy definition. With this in mind it might be a good idea to maintain two sets of definitions. One set would be an abridged version which would be easy to understand, and the other set would be lengthy and very detailed. The more detailed definitions could be applied in cases where the abridged version was not adequate to handle a specific situation.

It is not within the scope of this evaluation to propose a revised definitional framework for the CCD. The suggestions and illustrations contained in this section are presented for the purpose of identifying possible inconsistencies, conflicts and omissions. It is the hope of the author that this information, combined with the associated research on education agency structure, can provide a starting point for the whole process.

CHAPTER 5. THE IMPACT OF DATA FIELD DESCRIPTIONS ON CLASSIFICATION

In order to have a useful classification system, rules and conventions must be established for the structure and presentation of the basic reference information that identifies schools and agencies. The identifiers appearing in the school and agency files are discussed below.

Section 5.1 Agency File

NCES Identification Number - This number should be unique to a specific agency. It should never change as long as the underlying agency is still in existence. If an agency dissolves, its corresponding ID number should never be used again so that historical continuity can be preserved.

State Identification Number - Should only be adjusted when changed by the state. Many states have useful information coded into their own state identification numbers. For example, some states have a code designating the county in which the agency is headquartered as an integral part of the ID.

Agency Name - Should reflect the "legal" name of the LEA. Abbreviations should be standardized and strictly enforced. This item should only be changed when a school district legally changes its name. Former names should be documented in a record-specific memo field. This item should be carried in only one place. Currently it is carried on both the agency and the school files. In 1994–95 a total of 8,846 school records had agency names which did not match the agency names on the agency file. This is a difference of nearly 10 percent. Most of these names were permutations of each other, but there were several that were completely different. Keeping all the names in one file would eliminate this problem.

Education Agency Type Code - Should generally only be changed if the legal status of the agency is changed.

Supervisory Union Identification Number - Where the FIPS county is used this number should never be changed. Where a state assigned number is used this item should only change when the district joins a different union, or the state changes its union numbers.

FIPS County Codes - This is a reference item, but may be obsolete with the completion of the school district mapping project.

CMSA/PMSA/MSA Codes - These codes would change only when metropolitan areas were redefined, or when a school district annexed or lost territory, and served at least two counties which were not in the same metro area in the first place; this item may be obsolete as per above.

Metropolitan Status Code - This item may be obsolete as per above, and would only change in specific types of school district boundary changes.

Section 5.2 Education Agency Type Code

This variable is perhaps the most critical to agency classification. It consists of seven designations which describe the level of administrative and operational control of an agency and convey some information about the functions and/or structure of an agency. The definitions of each agency type are exhaustive through the use of an "all other" category. The only question is whether these definitions are exclusive enough.

The agency types are defined as follows:

Type 1 - Local school district that is not a component of a supervisory union.

Type 2 - Local school district component of a supervisory union sharing a superintendent and administrative services with other local school districts.

Type 3 - Supervisory union administrative center, or a county superintendent serving the same purposes.

Type 4 - Regional education services agency, or county superintendent serving the same purposes.

Type 5 - State-operated institution charged, at least in part, with providing elementary and/or secondary instruction or services to a special need population.

Type 6 - Federally operated institution charged, at least in part, with providing elementary and/or secondary instruction or services to a special need

populations. (should probably read "special needs population")

Type 7 - Other education agencies that do not fit into the first six categories.

Type 1

A type 1 agency is defined as a "local school district that is not a component of a supervisory union."

A "school district" is defined as "an education agency or administrative unit that operates under a public board of education." No definition is provided for the term "administrative unit." The specific mention of an administrative unit alongside the term "education agency" would tend to indicate that an "administrative unit" is not the same as an "education agency." With this in mind we must endeavor to determine the intent of the phrase "administrative unit." The phrase "administrative unit" presumably refers to a unit that performs some sort of administrative function, although the nature of this function is unclear.

The definition for a type 3 agency reads "supervisory union administrative center . . . " If a "supervisory union administrative center" is considered an administrative unit, then there may be a potential overlap in definitions of type 1 and type 3 agencies. If this is not the case, then the term "administrative unit" requires an associated definition.

The word "local" in the definition is assumed to mean an agency which does not serve the entire state, but rather a specific subdivision of the state. Then any agency which serves the state as a whole would be excluded from the type 1 designation. However, the states of Alaska, Hawaii, South Carolina, and Washington are reporting statewide agencies as type 1 agencies, or as components of existing type 1 agencies. The state of Minnesota also codes its charter schools, which are open to enrollment throughout the state, as type 1 agencies. These designations would all appear to be in error.

The education agencies of all the outlying territories are reported under type 1 even though they serve the entire territory. This also appears to conflict with the definition.

Type 2

A type 2 agency is defined as "local school district component of a supervisory union sharing a superintendent and administrative services with other school districts."

In addition to the potential problems associated with the definition of the term "local school district" discussed above, the type 2 agency definition produces more ambiguities. If the term "administrative unit" includes type 3 agencies, then a type 2 agency could potentially be a unit performing administrative functions that subsequently has its administrative functions performed by another entity. Unusual circumstances might dictate such an arrangement, but for the most part the definition appears to be redundant.

The designation of an agency as a type 2 causes it to be automatically associated with a supervisory union (i.e., a type 3 agency). An effort was made to match every type 2 agency reported with a corresponding type 3 agency. This could not be accomplished in the states of California, Massachusetts, and New York. In the state of New York, type 2 agencies are associated with type 4 agencies which perform both supervisory duties and regional education services. In Massachusetts, 41 of the 161 type 2 agencies could not be attributed to a type 3 or 4 agency. This was due mainly to the fact that many type 3 agencies associated with the 41 type 2 agencies were not assigned a "supervisory union identification number," and therefore, could not be matched to their appropriate type 2 agencies.

The type 2 agencies in California do not have any associated type 3 agencies per se. They share supervisory resources, but there is no separate agency that provides supervision. Many of these involve two school districts which share identical boards of education. In these cases, one district provides secondary level instruction, and the other provides elementary instruction. This is virtually identical to a situation in the state of Montana where they report districts involved in this sort of pairing as type 1 agencies. Thus, there is an apparent misclassification on the part of one or both of these states.

Type 3

A type 3 agency is defined as a "supervisory union administrative center, or a county superintendent serving the same purposes."

A "supervisory union" is defined as "an education agency where administrative services are performed for more than one school district by a common superintendent." Under the CCD classification scheme, it would be assumed that an agency reported as a type 3 would be mainly supervisory in nature. One would not expect to find type 3 agencies directly operating any schools, and this is the case in all states except for Massachusetts and Vermont. The reasons why type 3 agencies in these states are reporting schools are discussed in chapter 2.

Type 4

A type 4 agency is defined as a "regional education services agency, or county superintendent serving the same purposes."

A "regional education services agency" is defined as "agency providing services to a variety of local education agencies, or a county superintendent serving the same purposes." This would indicate that a type 4 agency must perform some services for local education agencies. The nature of these services, and whether they include direct provision of education, is not defined. Many of these agencies operate schools, while others do not. For those agencies that do operate schools, the majority operate special, vocational, and alternative education schools. Services provided by agencies that do not operate schools encompass a wide variety of functions.

One potential problem in this area, and throughout the agency classification system, is that of agencies which perform functions that can be coded into two or more of the existing agency type definitions. In cases such as these, it is unclear as to whether the agency should be coded according to some hierarchical scheme, or if it should be classified as a type 7 agency based on the fact that it does not fit exclusively into any of the other categories. For example, the Boards of Cooperative Educational Services (BOCES) in New York are reported as type 4 agencies, and in fact, do provide services to member school districts. They also provide supervision along the lines of a supervisory union defined as a type 3 agency.

Type 5

A type 5 agency is defined as a "state-operated institution charged, at least in part, with providing elementary and/or secondary instruction or services to a special need population."

The term "state-operated institution" is not defined, but the term "state-operated agency" is defined in the glossary. The word "institution" can denote an organization founded for a specific purpose, or a building or complex where an organization for the promotion of some cause is located. Since the list of definitions is based on agencies, it might be assumed that the former definition of the word "institution" is proper. If this is the case, then the word "agency" can be substituted for the word "institution," as they are somewhat synonymous.

With this in mind the definition of a "state-operated agency" reads "An education agency or program operated by a state/territorial government. Examples include elementary/secondary programs operated by the state for the deaf or blind; and programs operated by state correctional facilities." This definition would tend to indicate that a type 5 agency must be operated directly by a state or territorial government. Furthermore the agency must, at least in part, serve a special needs population. If the term "special needs population" is determined in its broadest sense, it would include all students who, for whatever reason, cannot be served in the traditional classroom under standard conditions. This would include students participating in special, alternative, and vocational education programs, students who are institutionalized in prisons or hospitals, and students who live outside of areas served by local school systems.

The fact that special needs populations need only be served in part, allows agencies which are operated by the state government and provide education in the traditional setting to traditional populations, to be included in this category as well. If this is the case then all of the territorial school systems, and the Department of Education of the state of Hawaii should be coded as type 5 agencies as opposed to the type 1 designation that they currently receive. If this is not the case, then the definitions need to be clarified to explain this apparent discrepancy.

The majority of the agencies reported in this category very closely parallel the examples cited in the definition of a "state-operated agency." The several vocational schools operated by the state of Kentucky and the several schools operated by state hospitals round out this category.

Reporting for the type 5 category appears to be incomplete. As indicated in Table 1, many states are not reporting these types of agencies on the survey. In fact thirty states have not reported eighty types of agencies which could potentially be classified as type 5 agencies. Some agencies which are currently reported under type 7 might be better classified under the type 5 category. The university laboratory schools in Florida and Indiana and the Department of Corrections schools in Louisiana are good examples of this. All of these agencies are run by the state government through a state university or department. Similar types of agencies in other states have been reported consistently as type 5 agencies.

The state of Washington reports all of its type 5 agencies as schools within an existing type 1 local education agency. This may be in error as the schools in question are under direct state control. This situation should be investigated for accuracy and documented.

Alaska and South Carolina report their type 5 agencies as type 1 agencies. In New Jersey, Rhode Island, and Texas, where the state appoints the school board for a local education agency, it is unclear whether these agencies should be classified as type 1, type 5, or type 7 agencies. Currently, they are classified as type 1 agencies.

Type 6

A type 6 agency is defined as a "federally operated institution charged, at least in part, with providing elementary and/or secondary instruction or services to a special need population."

This definition is virtually identical to the definition of a type 5 agency with the exception of the federal government being the operative agency in place of the state. By definition any education provided directly by the federal government will be provided to a special needs population. The type 6 category includes Bureau of Indian Affairs schools, schools on federal military bases both stateside and abroad, federal job corps programs for disadvantaged youth, and possibly other miscellaneous programs.

One of the major limitations of the type 6 category is that it puts a burden on the state governments to collect data on agencies over which they have no control and are often not aware of. Because of this, many agencies and the associated schools that would normally fall into this category, are not reported at all.

There are some agencies which have been reported in other categories which might be more accurately classified if they were placed in the type 6 category. One example of this is the St. Stephens Indian school in Wyoming which has been reported as a type 4 agency. The St. Stephens Indian school is included by the Bureau of Indian affairs in the list of schools under its jurisdiction. If this is accurate, then the school should probably be coded as a type 6 agency. The Pine Ridge Job Corps in Nebraska has been reported by the state as a type 5 agency. The United States Department of Labor reports the Pine Ridge Job Corps as one of its directly-operated job corps centers, in which case the agency would be more accurately coded under type 6. The Fort Leavenworth School District in Kansas is governed by a school board appointed by the commanding general of Fort Leavenworth, a federal installation. Although it does receive a small amount of local funding, the vast majority of its revenue derives from federal impact aid. This agency might be more accurately classified as a type 6 agency.

Type 7

A type 7 agency is defined as "other education agencies that do not fit into the first six categories."

As might be expected, this category consists of a variety of agencies, many of which could conceivably be recoded into other categories. Examples of this include the area vocational centers in Illinois and the computer associations in Ohio, both of which provide services to several school districts and might be more accurately coded as type 4 agencies. Other types of agencies that may fit into this category include university laboratory schools, charter schools, and private academies in Connecticut.

In summary, the "education agency type code" should be modified to account for situations where an agency might fit into more than one category and should be consistently applied across the various states to insure data comparability.

Table 1 contains a listing of all of the legally authorized education agencies within each state. Each type of agency is listed along with the agency type code which was reported on the survey. If no type code was provided an "N/A' is contained in the agency type

column, and if the agency was reported as a school instead of an agency the word "school" is contained in this column. There are also cases where one type of agency is reported under two or more different type codes. In these cases the type codes reported are set off with a "/." Information about the governing structure, services provided, and population served is also listed.

Several patterns can be found in table 1 for agencies which are not reported on the survey. Often times the governing body of the agency is not responsible for reporting data to the state education agency (survey respondent.) There are many cases where a federal, or state department run the agency independently of the State Department of Education. Even in cases where these types of agencies are reported, there is little or no associated data reported on the survey. In other words while many state education agencies acknowledge the existence of these entities, they are unable to collect data from them.

Other cases of non-reporting may stem from the fact that agency control is watered down through cooperative agreements. A number of school districts may form a cooperative governed by a board made of up school district representatives. While the school districts themselves are responsible for reporting to the state education agency, the cooperatives may not be. Sometimes financial considerations may result in non-reporting. For example the state of Massachusetts does not report their educational collaboratives because they are governed by the locals, and receive no state funding. Because of this the state considers these entities to be private, and, thus, out of the scope of the survey.

While the information in table 1 can often provide a good indication of why a particular type of agency is not reported, it can also raise further questions. For example agencies in some states which are directly controlled by the state education agency are not reported. It must be assumed in these situations that as the direct administrator of the agency that the respondent can provide data for it. Therefore, one can only speculate that the respondent views this type of agency as being out of the scope of the survey. Further investigation is needed in cases where there is no apparent explanation for the omission of certain types of agencies.

Section 5.3 Supervisory Union Identification Number

This variable is assigned to agencies which are members of a supervisory union, and to the union itself so that these related agencies may be linked together. The number is either assigned by the state, or a FIPS county code is used if the county superintendent is acting as the administrative center. Only relatively minor problems have been identified with this variable. Most of these problems involve an oversight in updating new arrangements, and deleting old ones no longer in force.

Section 5.4 FIPS County Codes, CMSA/PMSA/ MSA Code, Metropolitan Status Code

These variables are currently being assigned by the Census Bureau. Before, the reporting burden for these variables was placed on the states and the definitions were inconsistently applied and updated. The current system provides good coverage and consistency.

Section 5.5 Boundary Change Code

This code is perhaps one of the most valuable pieces of information for a longitudinal analysis of the CCD and related surveys. The code is intended to provide information on agency boundary changes from survey year to survey year. There are four possibilities for the code as follows:

BCC 1. No change since last report.

BCC 2. Education agency has closed with no effect on another agency's boundaries.

BCC 3. This is a new education agency formed with no effect on another agency's boundaries

BCC 4. Action taken to create, close, or modify this agency has affected the boundaries of at least one other agency. (Census Bureau obtains details by telephone.)

This set of definitions is neither exclusive nor exhaustive.

BCC 1

The first option is self-evident and a majority of agencies will carry this code from year to year.

BCC 2

The second code is very unlikely if a literal interpretation is used. For an agency to close and have no effect on another agency's boundaries one of several things has to happen. An agency which provided services to other existing agencies, such as a RESA or a supervisory union, will not affect the boundaries of another agency upon closing, unless their functions are assumed by another RESA or supervisory union. In the latter case, the surviving RESA or supervisory union will have increased its boundaries due to the consolidation. In the former case the functions performed by the agency are either delegated back to the underlying member districts, or abolished altogether.

The second possibility would be a type 5 or 7 agency which provided services to existing agencies, or whose geographical boundaries encompassed an area which was already served by an existing type 1 or 2 agency. If a state school for the deaf were to shut down, the responsibility for services would either be assumed by an existing agency or taken over by a newly formed agency. In this case, there would be no effect on the boundaries of another agency.

A third possibility would involve the closure of a federal military base. Students formerly served by such an agency would presumably continue to receive an education through either a local school district, if they remain in the area, or another Department of Defense school, if their families are transferred elsewhere.

A properly categorized type 1 or 2 agency that dissolves **must** have an effect on the boundaries of another agency. These agencies are responsible for providing education at the local level. Even if there are no students currently residing in the area of the district there must be a mechanism in place to educate any students that come along in future years. Because of this all type 1 and 2 agencies which dissolve must be coded under boundary change code 4 in order to accurately reflect their status. There are numerous errors in the data file due to this practice not being followed.

BCC 3

As with the second code, the third code can apply only under certain circumstances. For example, a new type 4 agency may consist of member school districts which form cooperatives to provide services. These new agencies in no way affect the boundaries of the underlying school districts and therefore, have no effect on the boundaries of an existing agency when they open. There are two notable exceptions to this. In states which already have statewide coverage by a particular type of agency, it would be impossible for a new one to form without duplicating services that are already in place. When this happens, it usually means that the boundaries of a similar type of agency have been affected because the school districts forming the new agencies were members of an existing agency before the formation.

The other exception is related to this. Even if coverage of a certain type of agency is not statewide, a school district which changes membership into a new agency will have automatically changed the boundaries of an agency which it left, unless that agency was dissolved altogether.

New agency types 5 and 7 may easily be formed without affecting the boundaries of an existing agency. A state could open a magnet school for math, science, or the arts, and it would not affect the boundaries of an existing school district. Likewise a charter school can be formed as a type 7 without changing any existing agency boundaries.

A new agency type 6 may or may not affect the boundaries of an existing agency. If the federal government puts up a new military base on existing land, it may create a new agency whose area of service was formerly taxed by an existing agency. On the other hand, if a new job corps center is opened, it has no effect on any existing boundaries.

Again type 1 and 2 agencies may not be newly formed without affecting the boundaries of an existing agency. The only way that this could occur is if the United States were to acquire a new territory. Even in cases where an unincorporated area incorporates and forms its own school system it is still affecting the boundaries of an existing agency, whether it is a state, county, or local agency.

BCC 4

The fourth code **must** be used for all type 1 and 2 agency closing and openings and may be used for the other categories as well. This code should probably be

used for a majority of closed agencies and for many new ones. Unfortunately, this code does not reveal whether an agency has closed, opened anew, or has merely had its boundaries changed through closings or openings of other agencies. Because of this, there may be limited usefulness for this code.

Researchers and analysts would be better served if this code were broken down into three codes: 1) a code indicating that this is a new agency whose opening has affected the boundaries of one or more existing or closed agencies; 2) a code indicating that this agency has closed and affected the boundaries of a new or existing agency; and 3) a code to denote that while this entity has been and still is in existence, its boundaries have been changed through actions of other agencies.

This sort of breakdown would provide valuable information that cannot currently be derived under the current definitional scheme.

Two examples are cited in the instructions for this code, the second of which appears to directly conflict with the definitions set out for the boundary change code. If the intent is for the examples to be followed, then the definitions should be changed accordingly. Otherwise, the examples should be changed to more accurately reflect the definitions.

It would be even more helpful to researchers if the actual details of the boundary changes were documented either directly in the file, or somewhere in the accompanying documentation. This would allow users of the files to determine exactly what occurred, and adjust their analysis accordingly.

Section 5.6 School File

NCES Agency Identification Number - This would only change if a school were to be annexed into another district through a merger or dissolution. In those cases the former ID and the specifics of the change could be documented in the memo field, or the school could be added to the reference file anew with a note linking it back to its former ID.

NCES School ID - This ID taken in combination with the Agency ID uniquely identifies individual schools on a national basis. Unfortunately when an existing school comes under the auspices of a new agency this ID often changes. This practice makes longitudinal studies on schools rather difficult, if not altogether impossible.

State Agency ID - This item is also carried on the agency file. It is specific to the agency, and should be maintained exclusively at the agency level. There were approximately one dozen instances of the state agency ID on the school file not matching the state agency ID on the agency file.

State School ID - This item is generally changed only if a school changes agencies or physical locations.

School Type Code - This item can change from year to year if a school changes focus, but is generally stable; it could be maintained either as a reference or a survey item, with different approaches required in each case.

Locale Code - Unless a school changes its physical location, or metropolitan areas are redesignated, this code will remain stable.

Aside from the name, address, and basic identifying information, there are several data fields which have their own sets of definitions. Some of these definitions are critical for classification purposes.

Section 5.7 School Type Code

Although not a variable on the Agency Universe Survey, the school type code can provide valuable information when used in conjunction with the agency type code. The school type code is defined as follows:

1. Regular School
2. Special Education School
3. Vocational Education School
4. Alternative Education School

The definition further reads that "school type information will be matched by NCES with agency type information. The additional information will identify each school as a locally operated public school, a regionally operated public school, state-operated public school, or federally operated public school."

Apparently the intent here is to match the school with the agency type code to define the school based on the agency which operates it. For example, a school operated by an agency with a type code of 5 would be considered to be a state-operated public school. It is not clear where these designations are used in the CCD

survey. This information generated through comparison, is not contained anywhere in the data set of the School Universe Survey.

An attempt was made to match the school type code against the authorized services of its parent agency. All agencies carrying an agency type 1 or 2 code were assumed to be authorized to perform any of the four school type functions and were not used for this comparison. Therefore, only agency types 3 through 7 were used. The information on authorized services was derived from Table 1. The results are as follows:

The only type 3 agencies reporting schools were in Massachusetts and Vermont. The regional school districts in Massachusetts reported operating "regular schools" only. This is consistent with their mission. Likewise the supervisory unions and districts in Vermont reported operating "special education schools" exclusively. Aside from services to school districts, and joint supervision, special education is the only service provided. No other type 3 agencies reported operating schools, nor did they report having any students. It is likely that these agencies merely engage in joint supervision which would be in line with their agency type code.

Several type 4 agencies reported operating schools. In Arizona the special education cooperatives reported operating both "special education" and "alternative education" schools. By state law they are only authorized to operate alternative education schools. The apparent erroneous reporting of special education schools may be due to the inadequate definitional boundaries regarding special and alternative education.

The county school boards in California reported a fairly equal distribution of special and alternative education which is consistent with their legal responsibilities. The only exception to this was the Los Angeles County High School for the Arts which was coded as a "regular school." This apparent misclassification is probably due to the ambiguous definition of "alternative education," and should probably be recoded as a school type 4.

The Boards of Cooperative Educational Services (BOCES) in Colorado report mostly special and alternative education which is consistent with their powers. There are two schools, however, which are reported as regular schools. These are the Melvin Hendrickson Development Center which is a Head Start program, and the Expeditionary Learning School which is an outward-bound school. The CCD definitions do not address the classification of Head Start programs. In the absence of guidance the respondent has classified this program as a regular school. It is not clear as to whether this is in keeping with the intentions of the CCD survey. The Expeditionary Learning School would probably be better classified as an alternative school, but the ambiguity of the definition for "alternative education" may have caused the respondent to report it as a regular school.

The cooperative and regional education service centers in Connecticut are reporting a mixture of types 1 and 2 schools. The schools reported as type 1 schools are magnet schools which would probably be more accurately classified under alternative education. This apparent misclassification may be due to the omission of programs for the gifted and talented from the CCD definitions.

The special education cooperatives in Illinois are strictly reporting schools as type 2 and appear to be in line with the CCD classification scheme.

The joint vocational education programs, education interlocals, and special education cooperatives are all reporting vocational and special education schools in accordance with their missions.

The vocational regions in Maine are reporting only vocational schools.

The county agricultural schools and the regional vocational-technical school districts in Massachusetts are all reporting type 3 schools exclusively. The regional school districts are reporting regular schools.

The Intermediate School Districts (ISD's) in Michigan are reporting all four types notwithstanding the fact that they are legally authorized to perform only special and vocational education. It appears that all of the schools reported as type 4 schools are Head Start programs. Because there is no specific guidance provided in the CCD survey for coding Head Start schools, the state of Michigan has classified them as alternative education. As mentioned earlier, the BOCES in the state of Colorado have classified Head Start as regular education. A check of Head Start programs nationwide reveals that states are reporting them as type 1, 2, or 4 schools depending on the state,

and in some cases, the individual situation. There is a need for further guidelines in this area to insure consistency throughout the survey.

The schools reported as regular schools by ISD's in Michigan are the Mott Middle College High School which is a school for at-risk students, and the Starr Commonwealth School which is a private school. It is not clear why the private school is being reported on the survey. The Mott Middle College High School would probably be best classified as an alternative education school, but again, in absence of a clear definition for an alternative school, this decision is apparently left up to the states.

Given the wide diversity and vast numbers of type 4 education agencies in Minnesota, the reporting was fairly consistent with authorized powers. Exceptions to this were the Blue Earth Alternative Center and Winnebago Treatment Center operated by the Blue Earth Area Joint Powers Agency which were reported as regular schools. Again this reporting may be due to the ambiguity of the definition of alternative education.

The educational service units in Nebraska reported exclusively special education schools which they are authorized to operate.

The county special services school districts and jointure commissions in New Jersey reported special education schools in agreement with their purposes.

The Boards of Cooperative Educational Services (BOCES) in New York are reporting regular schools exclusively. Some of these schools are Head Start programs, and their classification as type 1 schools is probably due to the insufficient guidance provided to respondents for the coding of Head Start programs. The other programs reported as regular schools are all ungraded. Given the fact that BOCES are authorized to provide special education, it is possible that these are in fact special education schools which have been miscoded as regular schools.

The multi-district special education programs, and multi-district vocational education centers in North Dakota are reporting special education schools and vocational education schools exclusively.

Education service districts in Oregon are reporting special and alternative education schools. This is in accordance with their legal authorization.

The area vocational/technical schools in Pennsylvania reported vocational education schools across the board. The York County High School and Lancaster County Academy were reported as regular schools. These two schools would probably be better classified as alternative schools. Again this reporting may be due to the insufficiency of the CCD definition of alternative education.

The multi-district vocational centers in South Dakota reported operating vocational education schools exclusively. The cooperative educational service units reported both special and alternative education as authorized by law.

The jointly operated vocational/technical centers in Virginia report only vocational education schools. The regional special education programs report special education schools exclusively.

The BOCES in Wyoming report special education schools. The Wyoming Center for Teaching and learning is reported as a regular school. This school would probably be best classified as an alternative school. Again this apparent misclassification may be due to inadequacies in the definition of the term "alternative education." The St. Stephens Indian School is classified as a type 4 agency, but is operated by the Bureau of Indian Affairs and it would probably be better classified as a type 6 agency. The school itself is classified as a type 4 alternative education school. The school does provide many innovative programs, but given the existing CCD definitions it is not clear whether this school should be classified as a regular school or an alternative education school.

Many type 5 agencies reported operating schools. There is a great amount of diversity and inconsistency of reporting for schools which have the same structure, and deliver the same services in different states. The schools of the deaf and blind are one example. They have been reported as regular, special, and alternative education schools by different states. The states of Arkansas, Idaho, Nebraska, and North Dakota all report these schools as regular education schools. The states of California, Florida, Louisiana, Minnesota, Mississippi, Missouri, Montana, New Mexico, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island, South Dakota, Utah, West Virginia, Wisconsin, and Wyoming report these schools as special education schools. The states of Illinois and Indiana report these schools as alternative education schools. The states of

Iowa, Kentucky and Ohio report agencies, but no corresponding schools. In Ohio the actual schools are reported under another agency. The state of Washington reports these schools under an existing local education agency. The states of Alabama, Alaska, Arizona, Colorado, Connecticut, Georgia, Kansas, Maine, Maryland, New Jersey, New York, Oklahoma, Tennessee, Texas, and Virginia do not report these schools or their respective agencies.

The CCD definition of a "special education school" clearly includes schools for the deaf and blind. If various exceptions in individual states would place these schools under a different category then each individual instance should be documented. If not, then these schools should be recoded to special education.

Similar patterns exist with other type 5 agencies and their associated schools. State corrections' schools, and schools for the mentally retarded are reported in various categories, or not at all. There may be several reasons for this, but it is clear that reporting in this area is both inconsistent and sporadic. An effort must be made to identify, investigate, and act on any discrepancies, and to collect missing data.

All type 6 agencies reported operating regular schools except the Chemewa Indian School in Oregon which was reported as an alternative school. No evidence can be found to support this designation. It may have been reported as an alternative school because the state of Oregon considers it to be outside of state jurisdiction. This is true with many Bureau of Indian Affairs schools which are not reported at all.

Type 7 agencies reported a wide variety of schools. Most schools corresponded to the mission of the agency. One notable exception may be the charter schools in Massachusetts. All of these schools were reported as regular schools despite the fact that some of them were created to use innovative teaching methods or to serve at risk populations. Given the fact that the mission of many charter schools would border on or encompass an alternative education approach, this area should be closely monitored in the future.

The SASS public school questionnaire enumerates five school type codes. These codes include the four used in the CCD survey, and one additional code. The definition of this additional code reads "elementary or secondary with a SPECIAL PROGRAM EMPHASIS - e.g., science/math school, performing arts high school, talented/gifted school, foreign language immersion school, etc." This fifth type includes many of the categories that are left up to the imagination of the respondents for the CCD survey. Perhaps it would be wise to either add an additional school type, or integrate the examples in the aforementioned definition into the existing categories where they should reside. The very fact that the SASS adds this type code and collects the information is demonstrative of the inadequacy of the current CCD definition. An exhaustive definition in this area could reduce respondent burden and duplicative collection practices.

In summary, problems with the school type code generally stem from the inadequacy of CCD definitions, especially in the area of alternative education. Various interpretations by different respondents have resulted in schools with identical structure and service delivery being reported differently. If the goal of the CCD survey is to provide both internal and external consistency, and statistical comparability within and between states, then much improvement and continued monitoring are needed in this area. Exceptions to the rule should be clearly documented. New agencies and schools should be checked for classification consistency. State coordinators should be given clearer guidelines for the classification and reporting of schools and agencies.

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Alabama	County boards of education	Popularly elected	All	1	General county population except for areas within a city school district
	City boards of education	Appointed by city	All	1	General city population
	Youth Services Department District	State appointed	All	5	Youth offenders throughout the state
	Alabama High School of Math and Science	Primarily state appointed	Alternative education	N/A	Exceptional students throughout the state
	Alabama School for the Deaf and Blind	State appointed	Special education, which may include adult and junior college level education	N/A	Deaf and blind students throughout the state. May accept students from outside the state in which case, tuition is charged.
	Alabama School of Fine Arts	State appointed	Alternative education	N/A	Exceptional students throughout the state
	State hospitals and development centers	State appointed	Special education	N/A	Special needs students under the jurisdiction of the Department of Mental Health and Mental Retardation
Alaska	Regional education attendance areas	Popularly elected	All	1	Areas outside an organized borough or municipality
	City and borough school systems	Popularly elected	All	1	Borough or city
	Regional resource centers	Appointed by member school systems	Vocational and special education, and various support services	N/A	Coterminous with the boundaries of member school systems
	Alaska School for the Deaf	The Department of Education	Special education	N/A	State
	Alyeska Central School	Department of Education	Correspondence programs	1	State
	Alaska Vocational-Technical Center	Department of Education	Vocational	N/A	State
	Mount Edgecumbe High School	Department of Education	Alternative	1	State
	Special Education Service Agency	State appointed	Special and alternative education, and related services to school systems	N/A	State
American Samoa	Department of Education		All	1	Territory

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Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Arizona	Common, joint common, joint unified, unified, and union high school districts	Popularly elected	All	1	Coterminous with district boundaries.
	Joint technological education districts	Popularly elected	Vocational education	7	Coterminous with member school districts, but students outside the service area may be accepted with tuition payments.
	County accommodation schools	County superintendent	All	1	Military reservations and areas outside of the boundaries of a school district
	County special education cooperatives	A member school district or the county superintendent	Alternative education	4	Coterminous with member school districts
	County superintendents	N/A	Fiscal agent for school districts in county	N/A	Coterminous with the county
	Arizona State School for the Deaf and Blind	State appointed	Special education and related services	N/A	State
	Arizona Department of Youth Treatment and Rehabilitation Education System	State	All	5	State
	Arizona Department of Economic Security, Division of Developmental Disabilities	State	Special education	N/A	State
Arkansas	School districts	Popularly elected	All	1	Coterminous with district boundaries
	Educational services cooperatives	Appointed by member school districts	Services to school districts	4	Coterminous with the boundaries of member school districts
	County board of education	Popularly elected	Fiscal services to school districts	N/A	County
	Secondary vocational centers	State or locally appointed	Vocational education	N/A	Coterminous with member school districts and in some cases, educational services cooperatives
	Department of Correction School District	State appointed	All	5	State
	Arkansas School for the Blind	State appointed	Special education	5	State
	Arkansas School for the Deaf	State appointed	Special education	5	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Arkansas (continued)	Arkansas Youth Services School System	State appointed	All	5	State
California	Elementary, high, and unified school districts	Popularly elected	All	1 or 2	Coterminous with district boundaries
	County school boards	Popularly elected	Special, vocational, and alternative education	4	County
	Regional occupational programs	County superintendent or local school district(s)	Vocational education	N/A	Can be coterminous with a county, single school district, or combination of school districts
	California School for the Blind	State Department of Education	Special education	5	State
	California School for the Deaf	State Department of Education	Special education	5	Reported as two agencies, northern and southern
	California State Summer School for the Arts	State and privately appointed	Alternative education	N/A	State
	Joint powers authorities	Appointed by member school districts	Services to school districts	N/A	Coterminous with member school systems
	Special education local plan area agencies	Specified in contract or formed as a joint powers agency	Special education	N/A	Coterminous with member school systems
	Charter schools	Set out in charter, often privately run	All	School	Coterminous with sponsoring school district
Colorado	School districts	Popularly elected	All	1	Coterminous with district boundaries
	Area vocational districts	Ex officio board members of Junior College and/or school districts served	Vocational education	N/A	Coterminous with member districts

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Colorado (continued)	Board of Cooperative Educational Services (BOCES)	Representatives of member school districts	May provide vocational, special, and alternative education as authorized by member districts, and services to member districts	4	Coterminous with member districts
	Colorado School for the Deaf and Blind	Advisory board appointed by the governor	Special education	N/A	State
	Colorado Magnet School for Mathematics, Science, and Technology	State appointed	Alternative education	N/A	State
	Charter schools	Non-profit corporation	All	School	Coterminous with sponsoring district
Connecticut	Regional school districts	Popularly elected	All	1	Coterminous with member towns
	City and town school systems	Popularly elected	All	1	Coterminous with city or town
	Regional educational service centers	Representatives of member school systems	Services to member school systems	4	Coterminous with member school systems
	Supervisory districts	Committee as provided for in authorizing agreement	Supervisory union	N/A	Coterminous with member school systems
	Private academies	Private non-profit corporation	All	7	Serves neighboring school systems
	Cooperative educational service centers	Committee appointed by members	Services to member school systems, including grant administration, special education, and alternative education	4	Coterminous with member school systems
	Regional vocational/technical schools	State board of education	Vocational education	5	State
	Unified School District #1 (Dept of Correction)	State appointed	All	5	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Connecticut (continued)	Unified School District #2 (Dept of Children and Families)	State appointed	All	5	State
	Unified School District #3 (Dept of Mental Retardation)	State appointed	Special education	5	State
	Department of Social Services	State appointed	Special education including services for the deaf and blind	N/A	State
Delaware	Reorganized school districts	Popularly elected, state appointed, or court appointed	All	1	Coterminous with district boundaries
	Department of Corrections	State appointed	All	5	State
	Department of Health and Social Services	State appointed	Special education	5	State
	Department of Services for Children, Youth, and Their Families	State appointed	All	5	State
	Reorganized school districts	Popularly elected, state appointed, or court appointed	All	1	Coterminous with district boundaries
	Department of Corrections	State appointed	All	5	State
	Department of Health and Social Services	State appointed	Special education	5	State
	Department of Services for Children, Youth, and Their Families	State appointed	All	5	State
District of Columbia	Washington, DC School System	Popularly elected	All	1	City
Florida	County school systems	Popularly elected	All	1	County
	Area technical centers	Governed by the county school system or by two or more systems jointly	Vocational education	School	Coterminous with member counties
	Correctional education school authority	State appointed	All	N/A	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Florida (continued)	Florida School for the Deaf and Blind	State appointed	Special education	5	State
	Developmental research schools	State university	Alternative education	7	State
	Educational consortiums	Member school systems	Services to school districts	N/A	Coterminous with member systems
	Special programs operated by the Department of Education	Department of Education	All	7	State
Georgia	County boards of education	Popularly elected	All	1	County
	Independent (city) school districts	Popularly elected	All	1	City
	Regional education service agencies	Selected by member school systems	Services to school systems	N/A	Coterminous with member school systems
	Special school district (Dept of Children and Youth Services)	State appointed	All	N/A	State
	Special school district (Dept of Corrections)	State appointed	All	N/A	State
	Migrant education agencies	Unknown	All	N/A	Regional
	Atlanta Area School for the Deaf	Dept of Education	Special education	N/A	Atlanta area
	Georgia School for the Deaf	Dept of Education	Special education	N/A	Balance of the state outside the Atlanta area
	Georgia Academy for the Blind	Dept of Education	Special education	N/A	State
Guam	Department of Education		All	1	Territory
Hawaii	Department of Education	Dept of Education	All	1	State
Idaho	School districts (joint, elementary, special charter)	Popularly elected	All	1	Coterminous with school district boundaries
	Cooperative service agencies	Determined by local school districts	Services to school districts	N/A	Coterminous with member school districts

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Idaho (continued)	Idaho School for the Deaf and Blind	State board of education	Special education	5	State
	Department of Juvenile Corrections Schools	State appointed	All	N/A	State
	Robert Janns School (Dept of Corrections)	State appointed	All	N/A	State
	School districts (joint, elementary, special charter)	Popularly elected	All	1	Coterminous with school district boundaries
	Cooperative service agencies	Determined by local school districts	Services to school districts	N/A	Coterminous with member school districts
	Idaho School for the Deaf and Blind	State Board of Education	Special education	5	State
	Department of Juvenile Corrections Schools	State appointed	All	N/A	State
	Robert Janns School (Dept of Corrections)	State appointed	All	N/A	State
Illinois	School districts (combined elementary, combined high, common, community high, high, non-high, township high, special charter, and Chicago)	Popularly elected, except Chicago (appointed by the Mayor)	All	1	Coterminous with district boundaries
	Area vocational centers	Representatives of member school districts	Vocational education	7	Coterminous with member districts
	Special education cooperatives	Representatives of member school districts	Special education	4	Coterminous with member districts
	Educational service centers	Appointed by county or regional superintendent	Special, alternative education, and services to school districts	N/A	Coterminous with educational service region (one or more counties)
	Department of Corrections School District	State appointed	All	5	State
	Department of Human Services	State appointed	Special education (schools for deaf, blind and rehabilitation)	5	State

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Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Illinois (continued)	Illinois Mathematics and Science Academy	State appointed	Alternative education	5	State
	University run high schools/laboratory schools	State appointed (run by state university)	Alternative education	5	State
Indiana	School districts (school townships, school cities and towns, county, community and united school corporations, and metropolitan school districts)	Popularly elected, appointed by local officials, or consisting of local officials serving, ex officio	All	1	Coterminous with district boundaries
	Joint vocational education programs	Appointed by member school districts	Vocational education	4	Coterminous with member districts
	Educational service centers	Appointed by member school districts	Services to member districts	4	Geographic regions as established by the state board of education
	Special education cooperatives	Appointed by member school districts	Special education	4	Coterminous with member districts
	Education interlocals	Appointed by member school districts	All services which may be performed by individual members	4	Coterminous with member districts
	University laboratory schools	State university	Alternative education	7	State
	Department of Corrections Schools	State appointed	All	5	State
	Department of Mental Health Schools	State appointed	Special education	5	State
	Department of Health Schools	State appointed	Special education	5	State
Iowa	School districts (community, consolidated, and independent)	Popularly elected	All	1	Coterminous with district boundaries
	Area education agencies	Appointed by member districts	Special education and services to school districts	4	Geographic regions established by the Department of Education

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Iowa (continued)	State board of regents (includes the Iowa Braille and Sight Saving School, the Iowa School for the Deaf, the University Hospital School, and the Malcolm Price Laboratory School)	State board of regents	Special and alternative education	5, agencies reported with no correspon-ding schools	State
	Department of Corrections	State appointed	All	5, agency reported with no correspon-ding schools	State
	Department of Human Services	State appointed	Special education	5, agency reported with no correspondin g schools	State
Kansas	Unified school districts	Popularly elected	All	1	Coterminous with district boundaries
	Ft. Leavenworth Unified School District	Appointed by the commanding general of Fort Leavenworth	Elementary and middle school only	1	Coterminous with the boundaries of the Fort Leavenworth military base
	Education interlocals	Set out in the interlocal agreement forming the agency	Services to member districts and Special education	N/A	Coterminous with member districts
	Area vocational/technical schools	Consists of representatives of member school districts	Vocational education	N/A	Coterminous with member districts
	Educational service centers	Appointed according to the terms of the formation agreement	Services to member school districts	N/A	Coterminous with member districts
	Special education cooperatives	Administered by one of the member school districts	Special education	N/A	Coterminous with member school districts
	State youth centers	State appointed	All	N/A	State
	Kansas State School for the Deaf	State board of education	Special education	N/A	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Kansas (continued)	Kansas State School for the Blind	State board of education	Special education	N/A	State
Kentucky	County school districts	Popularly elected	All	1	County
	Independent (city) school districts	Popularly elected	All	1	City
	Kentucky School for the Blind	State board of education	Special education	5	State
	Kentucky School for the Deaf	State board of education	Special education	5	State
	Area vocational education centers and state vocational/technical schools	State board for adult and technical education	Vocational education	5	State
Louisiana	Parish school districts	Popularly elected	All	1	Parish (County)
	City school districts	Popularly elected	All	1	City
	Louisiana School for the Deaf	State department of education	Special education	5	State
	Louisiana School for the Visually Impaired	State department of education	Special education	5	State
	Louisiana School for Math, Science, and the Arts	Primarily state appointed	Alternative education	5	State
	Louisiana Special Education Centers	State department of education	Special education	5	State
	Department of Corrections Schools	State appointed	All	7	State
	Special School District I	State department of education	Special education	5	State
	Regional service centers	Appointed by member school systems	Services to school districts	N/A	Coterminous with member school systems. Boundaries specified by State Department of Education

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Maine	School districts (school administrative, community, and incorporated)	Popularly elected, or consisting of elected officials serving ex officio	All	1	Coterminous with member cities and towns
	Vocational regions	Appointed by member school systems	Vocational education	4	Coterminous with member school systems
	State schools in the unorganized territory	State Department of Education	All	5	Unorganized areas of the state
	Municipal school systems	Popularly elected	All	1 and 2	City or town
	School unions (includes Maine Indian education)	Appointed by member school systems	Joint superintendency	3	Coterminous with member school systems
	Units under district superintendents and agents of the commissioner	State or local superintendent of another system	Administration for units which do not require full time services	4	Statewide for school systems which meet the criteria
	Maine Conservation School	State appointed	Alternative education	N/A	State
	Governor Baxter School for the Deaf	State appointed	Special education	N/A	State
	Maine School for Science and Mathematics	Primarily state appointed	Alternative education	N/A	State
	Arthur R. Gould School (Dept of Corrections)	State appointed	All	N/A	State
	Indian school committees	Popularly elected by tribal members	All	2	Coterminous with tribal territory
Maryland	County school systems	State appointed, or popularly elected	All	1	County
	City school systems (Baltimore)	Appointed by the Mayor	All	1	City
	Maryland School for the Deaf	State appointed	Special education	N/A	State
	Maryland School for the Blind	State appointed	Special education	N/A	State
	Regional institutes for children and adolescents	State appointed	Special education	N/A	Regions as specified by the state

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Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Maryland (continued)	Correctional Education Program (within the Dept of Education)	Department of Education	All	N/A	State
Massachusetts	School districts (regional, regional vocational/technical, and independent technical)	May be popularly elected or appointed as specified in formation agreement	All	1, 2, 3, and 4	Coterminous with member cities and towns
	County agricultural schools	County governing body and state appointees	Vocational education	4	County
	City and town school systems	Popularly elected, or nonexistent	All	1, 2, and 3	Coterminous with city or town
	Educational collaboratives	Appointed by member school systems	Special and vocational education	N/A	Coterminous with member school districts
	Institutional schools	Department of Education	Special education	5	State
	Massachusetts Hospital School	State appointed	Special education	5	State, reported as a school under the Department of Education institutional schools
	Charter schools	Specified in charter, may be a non-profit corporation or a group of parents or teachers	Alternative education	7	State, but preference is given to school system in which school is located
Michigan	School districts (general powers, first class, and local act)	Popularly elected	All	1	Coterminous with district boundaries
	Intermediate school districts	Popularly elected, or appointed by member school districts	Vocational, special education, and services to school districts	4	Coterminous with member school districts
	Department of Corrections	State appointed	All	5	State, but no schools reported
	Department of Education (School for the Deaf, Blind, etc.)	State board of education	Special education	5	State, but no schools reported

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Michigan (continued)	Department of Mental Health	State appointed	Special and vocational education	5	State, but no schools reported
	Department of Social Services	State appointed	Special and vocational education	5	State, but no schools reported
	Public school academies (charter schools)	Specified by sponsoring agency	Alternative education	7	State, but preference may be given to students in a specific geographic area depending upon sponsorship arrangements
Minnesota	School districts (common, independent, and special)	Popularly elected	All	1	Coterminous with district boundaries
	Area learning centers	Sponsoring agency (reported as schools on CCD)	Vocational, alternative education, and services to districts	School	Coterminous with member agencies, but may serve additional areas
	Educational cooperative service units (subsequently repealed and replaced by service cooperatives)	Majority of board appointed by member school districts. The remainder of the board may be appointed by the initial appointees, or by other members including cities counties and towns	Vocational, alternative education, and services to members	4	Coterminous with member agencies
	Education districts	Appointed by member agencies which may include several types of governments	Vocational, alternative education, and services to members	4	Coterminous with member agencies
	Elementary secondary vocational computer regions (now regional management information centers)	May be created and structured in the same manner as a service cooperative, or under terms of an interlocal agreement	Services to member agencies	N/A, but had been reported on previous CCD agency universes	Coterminous with member agencies
	Secondary cooperative facilities districts (joint high schools)	Appointed by member school districts	Capital facilities, and secondary education	4	Coterminous with member districts
	Special education cooperatives	Appointed by member school districts	Special education	4	Coterminous with member districts

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Minnesota (continued)	Telecommunications districts	Appointed by member school districts	Services to member districts	N/A	Coterminous with member districts
	Intermediate school districts	Appointed by member school districts	Vocational and special education	4	Coterminous with member districts
	Charter schools	Non-profit corporation	Alternative and special education	1	State, but preference may be given to local residents
	Cooperative centers for vocational education	Appointed by member agencies which may include cities, counties, and towns	Vocational education	4	Coterminous with member districts and governments
	Interdistrict councils	Appointed by member districts	Services to school districts	4	Coterminous with member districts
	School for the Deaf	Department of Education	Special education	5	State
	Braille and Sight Saving School	Department of Education	Special education	5	State
	School for the Arts	State appointed	Alternative education	5	State
Mississippi	School districts (municipal separate, countywide, consolidated, line consolidated, and special municipal separate)	Popularly elected	All	1	Coterminous with district boundaries
	Agricultural high schools	Appointed by the county	Vocational education	School	County
	South Mississippi Regional Center	State appointed	Special and vocational education	5	State
	Mississippi School for the Blind	State board of education	Special education	5	State
	Mississippi School for the Deaf	State board of education	Special education	5	State
	Ellisville State School	State appointed	Special education	5	State
	Mississippi School for Math and Science	State board of education	Alternative education	5	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Mississippi (continued)	Mississippi Department of Human Services, Division of Youth Services	State appointed	All	5	State
	Hudspeth Center	State appointed	Special education	5	State
	Mississippi State Hospital	State appointed	Special education	5	State
	Stovall Special Education Complex	State appointed	Special education	5	State
Missouri	School districts (six director, urban, and metropolitan)	Popularly elected	All	1	Coterminous with district boundaries
	Special school districts	Popularly elected	Special education	1	Coterminous with district boundaries
	State schools for the severely handicapped (includes schools for the deaf and blind)	State board of education	Special education	5	State
	Department of Corrections Schools	State appointed	All	N/A	State
	Division of Youth Services Schools	State appointed	All	5	State
	University laboratory schools	State university	Alternative education	N/A	State
	Area vocational/technical high schools (run by community colleges)	Consists of the board of the community college district	Vocational education	7	Coterminous with community college district boundaries
Montana	School districts (elementary, high, K-12, and county high)	Popularly elected	All	1	Coterminous with district boundaries
	Education cooperatives	Appointed by participating school districts	All (may perform any function of the authorizing districts)	4	Coterminous with member districts
	Montana Developmental Center	State appointed	Special education	N/A	State
	Pine Hills School	State appointed	All	5	State
	Mountain View School	State appointed	All	5	State

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Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Montana (continued)	Montana State School for the Deaf and Blind	Board of public education	Special education	5	State
	Department of Corrections Schools	State appointed	All	N/A	State
	County superintendents	Popularly elected	Services to school districts	3	County
Nebraska	School districts (Class I, II, III, IV, V, and VI)	Popularly elected	All	1 and 2	Coterminous with district boundaries
	Educational service units	Popularly elected	Special education and services to school districts	4	Regions specified by the state legislature
	Kearney West and Geneva North Schools	State appointed	All	5	State
	Nebraska School for the Deaf	State department of education	Special education	5	State
	Nebraska School for the Visually Handicapped	State department of education	Special education	5	State
	Pine Ridge Job Corps	Federally run through the Department of Labor	Alternative and vocational education	5	State
	University of Nebraska, Lincoln Independent Study High	State appointed	Alternative education (mostly correspondence)	5	Worldwide
Nevada	School districts	Popularly elected	All	1	County or city
	Nevada Youth Training Center	State appointed	All	5	State
New Hampshire	School districts (cooperative, interstate, regular, and special)	Popularly elected except for cooperative districts whose board composition is determined in the formation agreement	All	2	Coterminous with district boundaries
	Coos County School District	Governed by the county commissioners	All	2	Coterminous with the unincorporated areas of Coos county
	Authorized regional enrollment areas	Joint meetings of member school districts	All (allows for sharing of facilities and services for specific grade levels	School	Coterminous with member districts

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
New Hampshire (continued)	City school systems	Appointed by the city council, or popularly elected	All	2	City
	School Administrative Units (SAU's)	Representatives of member school districts	Joint supervision and services to school districts	3	Coterminous with member school districts
	Approved Public Academies	Privately controlled	All	2	State, but accepts students under contract from school districts in the general geographic area
	Secondary regional vocational centers	Advisory committee consisting of representatives from member school districts	Vocational education	N/A	Coterminous with member school districts
New Jersey	School districts (Type I, Type II, and regional)	Popularly elected (Type II, and regional) or appointed by the municipal executive (Type I)	All	1	Coterminous with district boundaries
	County vocational school districts	Appointed by county executive or judge of superior court	Vocational education	1	County
	County Special Services School Districts	Appointed by county governing body	Special education	4	County
	Jointure commissions	Representatives of member school districts	Special education	4	Coterminous with member districts
	State operated school districts	Appointed by state board of education	All	1	Coterminous with school system subject to state takeover
	Marie H. Katzenbach School for the Deaf	Advisory board appointed by state board of education	Special education	N/A	State
	Schools run by Department of Corrections	State appointed	All	N/A	State
	Schools operated by the Department of Human Services	State appointed	Special education	N/A	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
New Jersey (continued)	New Jersey School of the Arts	State Department of Education	Alternative education	N/A	State
New Mexico	School districts	Popularly elected	All	1	Coterminous with district boundaries
	Regional education cooperatives	Representatives of member school systems	Services to member systems	N/A	Coterminous with member systems
	New Mexico School for the Deaf	State appointed	Special education	N/A	State
	New Mexico School for the Visually Handicapped	State appointed	Special education	N/A	State
	State run schools (several)	State appointed	All	N/A	State (several of these schools were reported in operation prior to the 1994–95 CCD. In that year they were reported as closed, and have not been reported in operation since despite strong evidence that they are alive and well)
New York	School districts (central, central high, city, common, enlarged city, union free)	Popularly elected except Yonkers and New York City where the board is appointed by the city governing body	All	1 and 2	Coterminous with district boundaries
	Boards of Cooperative Educational Services (BOCES)	Appointed by member school districts	Special and vocational education and services to school districts	4	Coterminous with member districts
	Vocational education and extension boards	Appointed by the county governing body	Vocational education	N/A	County
	School supervisory districts	Superintendent appointed by BOCES in which district is located	Shared supervision	N/A	Coterminous with member districts
	Special act school districts	Appointed by churches or non-profit corporations	Special education	1 and 2	Coterminous with the land owned by the church or non-profit corporation

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
New York (continued)	New York State School for the Deaf	State appointed	Special education	N/A	State
	New York State School for the Blind	State appointed	Special education	N/A	State
North Carolina	County and city school administrative units	Popularly elected (may be appointed in cities by the city governing body, or the county school administrative unit)	All	1	County or city
	North Carolina Schools for the Deaf and Blind	State appointed	Special education	5	State
	North Carolina School for Science and Mathematics	State appointed	Alternative education	5	State
	Training schools run by the Division of Youth Services (Dept of Human Resources)	State appointed	All	N/A	State
	Schools run by the Division of Mental Health, Developmental Disability, and Substance Abuse Services	State appointed	Special education	N/A	State
	North Carolina School for the Arts	State appointed	Alternative education	N/A	State
	The Governor's School of North Carolina	State appointed	Alternative education	N/A	State
North Dakota	School districts	Popularly elected	All	1	Coterminous with district boundaries
	Military installation school districts	State appointed	All	1	Coterminous with district boundaries (i.e., federal military installation)
	School for the Deaf	State appointed	Special education	5	State
	School for the Blind	State appointed	Special education	5	State
	Marmot School (ND Youth Correctional Center)	State appointed	All	5	State
	Developmental Center at Westwood Park (run by Dept of Human Services)	State appointed	Special education	N/A	State
	Multidistrict Vocational Education Centers	Appointed by member school districts	Vocational education	4	Coterminous with member districts

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
North Dakota (continued)	Multidistrict special education programs	Appointed by member school districts	Special education	4	Coterminous with member districts
Northern Mariana Islands	Public school system		All	1	Commonwealth
Ohio	School districts (city, exempted village, and local)	Popularly elected	All	1 and 2	Coterminous with district boundaries
	County (and joint county) school districts	Popularly elected	Supervision of school districts	3	County(ies) served
	Joint vocational school districts	Appointed by member school districts	Vocational education	1	Coterminous with member districts
	Special Education Regional Resource Centers (SERRCs)	Appointed by member school districts	Services to school district with an emphasis on special education related services	4	Coterminous with member districts
	Computer Associations (OH Educational Computer Network)	Appointed by member school districts	Services to school districts with an emphasis on automation	7	Coterminous with member districts
	Ohio School for the Deaf	State appointed (by Dept of Education)	Special education	5	State
	Ohio School for the Blind	State appointed (by Dept of Education)	Special education	5	State
	Department of Youth Services	State appointed	All	N/A	State
	Ohio Central School System (Dept of Rehabilitation and Correction)	Dept of Rehabilitation and Correction	All	N/A	State
	County Boards of Mental Retardation and Developmental Disabilities	County appointed	Special education	N/A	County

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Ohio (continued)	State Institutions and Hospitals	Operated by the Departments of Mental Health, Mental Retardation, and Developmental Disabilities	Special education	N/A	State
Oklahoma	School districts (independent and elementary)	Popularly elected	All	1	Coterminous with district boundaries
	Area vocational/technical school districts	Popularly elected	Vocational education	N/A	Coterminous with member districts
	Regional education service centers	State Department of Education	Services to school districts	N/A	Coterminous with member districts
	Interlocal cooperatives	Appointed by member districts	Special education and any other services which may be provided by a district individually	N/A	Coterminous with member districts
	Parkview School for the Blind	State Commission for Rehabilitative Services	Special education	N/A	State
	Oklahoma School for the Deaf	State Commission for Rehabilitative Services	Special education	N/A	State
	Oklahoma School of Science and Mathematics	State appointed	Alternative education	N/A	State
Oregon	School districts (county unit, common, joint, and union high)	Popularly elected	All	1	Coterminous with district boundaries
	Education service districts	Popularly elected	Special and alternative education, services to school districts, and funding equalization	4	Regional, set by state legislature
	Oregon School for the Deaf	State superintendent of public instruction	Special education	5	State
	Oregon School for the Blind	State superintendent of public instruction	Special education	5	State

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Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Oregon (continued)	Department of Corrections	State appointed	All	5	State
	Department of Human Resources Schools	State appointed	Special education	5	State
Pennsylvania	School districts (first class A, first, second, third, and fourth class)	Popularly elected (except first class appointed by the Mayor of Philadelphia)	All	1	State
	Area Vocational/Technical Schools (AVTS)	Appointed by member districts	Vocational education	4	Coterminous with member districts
	Intermediate units	Appointed by member school districts	Special, vocational, alternative education, and services to school districts	4	Coterminous with member districts
	Joint special education programs	Rules set by state board of education, may be run jointly by two or more districts or privately contracted. Reported as two large agencies under the State Department of Education	Special and alternative education	5	State (except for Philadelphia, and Pittsburgh)
	Consortiums formed under intergovernmental agreements (malls and schools)	Appointed by member school districts	Alternative education	4	Coterminous with member districts
	Scranton State School for the Deaf	State appointed	Special education	5	State
	Scotland School for Veterans Children	State appointed	All	5	State
	Schools in State Correctional Institutions	Department of Education (each school reported as a separate agency)	All	5	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Puerto Rico	Department of Education	Secretary of Education appointed by the Governor	All	1	Commonwealth
Rhode Island	Regional School Districts	Selected through meeting of participating cities and towns	All	1	Coterminous with member cities and towns
	Municipal school systems (city and town)	Popularly elected	All	1	City or town
	Collaborative schools	Appointed by member school systems	Special education and services to districts	N/A	Coterminous with member school systems
	Central Falls School District	Primarily state appointed	All	1	Coterminous with the city of central falls
	Rhode Island Training School for Youth	Department of Corrections	All	N/A	State
	Board of Regents Schools (includes School for the Deaf, and Davies Career-Technical School)	State board of regents for elementary secondary education	Special and vocational education	5	State
South Carolina	Countywide school districts	Popularly elected, appointed by state officials or a combination of the two	All	1	County
	Independent school districts	Popularly elected, appointed by state officials or a combination of the two	All	1	Coterminous with district boundaries
	Joint vocational schools (area vocational centers)	Appointed by member school districts	Vocational education	School	Coterminous with member districts
	County superintendents	Popularly elected	Services to school districts	4	County (office has been abolished in many counties)
	Department of Juvenile Justice (special school district)	Department of Juvenile Justice	All	1	State
	School for the Deaf and Blind	State appointed	Special education	1	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
South Carolina (continued)	John De La Howe School	State appointed	Vocational education (Agriculture and Forestry)	N/A	State
	Will Lou Gray Opportunity School	State appointed	Vocational and alternative education	N/A	State
	University laboratory schools	State university	Alternative education	1	State
	Palmetto Unified School District # 1	Department of Corrections	All	1	State
	Schools run by the Department of Disabilities and Special Needs	Department of Disabilities and Special Needs	Special education	N/A	State
South Dakota	School districts	Popularly elected	All	1	Coterminous with district boundaries
	Cooperative educational service units	Appointed by member school districts	Special and alternative education, and services to school districts	4	Coterminous with member districts
	Multidistrict vocational centers	Appointed by member school districts	Vocational education	4	Coterminous with member districts
	South Dakota State Training School	Department of Corrections	All	5	State
	South Dakota School for the Deaf	State board of regents	Special education	5	State
	South Dakota School for the Visually Handicapped	State board of regents	Special education	5	State
	South Dakota Development Centers (Custer-Richmond) listed as two separate agencies	Department of Corrections	All	5	State
Tennessee	Special school districts	Popularly elected, but some districts have additional appointed members	All	1	Coterminous with district boundaries

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Tennessee (continued)	County and municipal school systems	Popularly elected	All	1	County or city
	Department of Children's Services (special school district)	Department of Children's Services	All	N/A	State
	Department of Corrections (special school district)	Department of Corrections	All	N/A	State
	Department of Mental Health and Mental Retardation (special school district)	Department of Mental Health and Mental Retardation	Special education	N/A	State
	Special schools administered by the Department of Education (York Agricultural Institute, TN Preparatory School, TN School for the Blind, TN School for the Deaf, and West TN School for the Deaf)	Appointed by the Department of Education	Special, alternative, and vocational education	N/A	State
	Tennessee Foreign Language Institute	State appointed	Foreign language instructional assistance	N/A	State
Texas	School districts (common, independent, municipal, and rural high)	Popularly elected	All	1	Coterminous with district boundaries
	Industrial training school districts	Popularly elected and appointed	Vocational education	1	Coterminous with district boundaries
	Rehabilitation Districts for the Handicapped	Appointed by the county	Special education	1	Coterminous with district boundaries
	Special purpose school districts	Appointed by the State Commissioner of Education	All	1	Coterminous with district boundaries
	Regional education service centers	Appointed by member school districts	Services to school districts	N/A	Regions set out by state board of education
	Texas School for the Deaf	State appointed	Special education	N/A	State

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Texas (continued)	Texas School for the Blind and Visually Impaired	State appointed	Special education	N/A	State
	Texas Youth Commission	Texas Youth Commission	All	N/A	State
	Military reservation school districts	Appointed by state board of education	All	1	Coterminous with district boundaries
	State schools (operated by the Department of Mental Health and Mental Retardation)	Department of Mental Health	Special education	N/A	State
Utah	School districts (city and county)	Popularly elected	All	1	City or county
	School for the Deaf	State board of education	Special education	5	State
	School for the Blind	State board of education	Special education	5	State
	Applied technology centers	Appointed by state board of education	Vocational education	4	Regional as specified by the state
	Regional service centers	Superintendents of member school districts	Services to school districts and special education	N/A	Regions as specified by the state. Serves mainly rural areas.
Vermont	School districts (city, town, incorporated, union, and interstate)	Popularly elected, except appointed by member school districts for union and interstate school districts)	All	2	Coterminous with district boundaries
	Supervisory unions and districts	Appointed by member school districts	Joint supervision, special education, and services to school districts	3	Coterminous with member districts. Supervisory districts serve a single school district
	Independent high schools	Private non-profit corporation	High school	1	As private schools these entities may serve pupils worldwide
	Schools in unorganized towns and gores operated by the state	Public education in these areas is provided through a state property tax levy on the unincorporated areas	Students sent to neighboring districts	N/A	Unorganized towns, gores and grants

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Vermont (continued)	Eldred School (VT State Hospital)	Department of Developmental and Mental Health Services	Special education	N/A	State
	Woodside Juvenile Rehabilitation Center	Department of Social and Rehabilitation Service	All	N/A	State
Virgin Islands	Department of Education	Commissioner of Education appointed by the Governor	All	1	Territory
Virginia	County, city, and town school systems	Popularly elected	All	1	County, city, or town
	Joint schools	School boards of participating school systems serving, ex officio	All	1	Coterminous with member school systems. Reported as a school(s) within the system of one of the contracting parties
	State operated schools (includes schools for the deaf and blind, Dept of Corrections Schools, and state hospital and training schools)	State board, agency or institution having children in custody	All	N/A	State
	Jointly operated vocational/technical centers	Set out in joint agreement	Vocational education	4	Coterminous with member school systems
	Regional special education programs	Set out in joint agreement	Special education	4	Coterminous with member school systems
	Regional Academic Governors' Schools	Appointed by member school systems	Alternative education	1	Coterminous with member school systems
Washington	School districts (first and second class)	Popularly elected	All	1	Coterminous with district boundaries
	Educational services districts	Appointed by member school districts	Services to school districts	N/A	Coterminous with member districts
	Secondary vocational skills centers	Appointed by member school districts	Vocational education	Reported within an existing local school district	Coterminous with member districts

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Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Washington (continued)	School for the blind	State appointed	Special education	Reported within an existing local school district	State
	School for the deaf	State appointed	Special education	Reported within an existing local school district	State
	Residential habilitation centers	State appointed	Special education	Reported within an existing local school district	State
	Delinquent centers	State appointed	All	Reported within an existing local school district	State
	Adult correctional institutions	Department of Corrections	All	N/A	State
West Virginia	County school districts	Popularly elected	All	1	County
	Multi-county regional service agencies	Set out by State Department of Education	Services to school districts	N/A	Coterminous with participating school districts
	Multi-county vocational schools	Appointed by member school districts	Vocational education	School	Coterminous with participating districts
	West Virginia schools for the deaf and blind	State board of education	Special education	5	State
	Institutional education programs	State appointed (some under the direct supervision of the Department of Education)	All	5	State
Wisconsin	School districts (common, unified, union high, and first class)	Popularly elected	All	1	Coterminous with district boundaries
	Vocational/technical and adult education districts	Appointed by participating school districts or counties	Vocational education	N/A	Coterminous with member districts or counties
	County Handicapped Children's Education Boards	Appointed by the county	Special education	N/A	County
	Cooperative Educational Service Agencies	Appointed by member school districts	Services to member districts	N/A	Coterminous with member districts

Table 1. Characteristics of Agencies Authorized to Provide Public Educational Services by State (1994-95) (continued)

State	Agency	Governing Body	Services Provided	Agency Type	Population Served
Wyoming	School districts (elementary and unified)	Popularly elected	All	1	Coterminous with district boundaries
	Boards of Cooperative Educational Services (BOCES)	Appointed by member school districts	Vocational, alternative, special education, and services to school districts	4	Coterminous with member districts
	Wyoming School for the Deaf	Superintendent of public instruction	Special education	5	State
	Wyoming Girls' School	Department of Family Services	All	5	State
	Wyoming Boys' School	Department of Family Services	All	5	State
	Wyoming Youth Treatment Center	Department of Family Services	All	5	State
	Wyoming State Training School	State Department of Health	Special education	N/A	State
	Educational Resource Centers	Run directly by a school district or a BOCES	Special education support services	Reported as part of existing schools	Coterminous with member districts
	Schools run by Dept of Corrections (WY Honor Farm, State Penitentiary, and Womens' Center	Department of Corrections	All	N/A	State
	St. Stephens Indian School	Federal Bureau of Indian Affairs	All	4	Determined by Bureau of Indian Affairs
	University Laboratory Schools (WY Centers for Teaching and Learning at Laramie)	University of Wyoming	Alternative education	4	State

N/A = "Not Available"
school = reported as a school on the survey under another LEA

Table 2.
Agencies Legally Responsible for Providing Basic Public Education by State 1994-95 (Excludes the Outlying Areas)

State	Unit(s) Responsible for Basic Education	Geographic Area Served
Alabama	County and city boards of education	County or city
Alaska	City and borough school systems	City or borough
	Regional education attendance areas	All areas not served by organized city or borough school systems
Arizona	School districts (common, joint unified, unified, joint common, union high)	Generally not coterminous with established governmental units.
	County accommodation schools	Serve military reservations or territory which is not included within the boundaries of a school district
Arkansas	School districts	Generally not coterminous with established governmental units
California	School districts (elementary, high school, and unified)	Generally not coterminous with established governmental units
Colorado	School districts	Generally not coterminous with established governmental units
Connecticut	City and town school systems	City or town
	Regional school districts	Coterminous with member cities and towns
Delaware	Reorganized school districts	Generally not coterminous with established governmental units
District of Columbia	City school system	City
Florida	County school systems	County
Georgia	County boards of education	County, exclusive of any cities served by independent school districts
	Independent school districts	City
Hawaii	State department of education	Entire state
Idaho	School districts (joint, elementary, special charter)	Generally not coterminous with established governmental units
Illinois	Chicago school district	City of Chicago
	School districts (combined elementary, combined high, common, community high, high, nonhigh, township high, and special charter)	Generally not coterminous with established governmental units
Indiana	School districts (school townships, school cities and towns, county, community and united school corporations, and metropolitan school districts)	Generally not coterminous with established governmental units
Iowa	School districts (community, consolidated, and independent)	Generally not coterminous with established governmental units
Kansas	Unified school districts	Generally not coterminous with established governmental units
	Ft. Leavenworth Unified School District	Serves the Fort Leavenworth military base

Table 2.
Agencies Legally Responsible for Providing Basic Public Education by State 1994-95 (Excludes the Outlying Areas) (Continued)

State	Unit(s) Responsible for Basic Education	Geographic Area Served
Kentucky	County school districts	County, excluding any cities served by independent school districts
	Independent school districts	City
Louisiana	Parish and city school districts	Parish or city
Maine	Municipal school systems	Cities or towns which are not members of school districts
	School districts (school administrative, community, and incorporated)	Coterminous with member cities and towns
	State schools in the unorganized territory	Unincorporated areas of the state
Maryland	County school systems	County
	City school systems (Baltimore)	Independent city of Baltimore
Massachusetts	City and town school systems	City or town
Michigan	School districts (general powers, and local act)	Generally not coterminous with established governmental units
	First class school district (Detroit)	Coterminous with the city of Detroit
Minnesota	School districts (common, independent, and special)	Generally not coterminous with established governmental units
Mississippi	School districts (municipal separate, countywide, consolidated, line consolidated, and special municipal separate)	Generally not coterminous with established governmental units
Missouri	School districts (six director, urban, and metropolitan)	Generally not coterminous with established governmental units
	Special school districts for handicapped children	May cover the entire area of an existing school district, or parts of one or more existing school districts. Can be coterminous with another governmental unit if so desired by the voters. These units constitute separate taxing districts, and once they are formed, services formerly provided by school districts must be provided exclusively by the special school district within its geographic boundaries.
Montana	School districts (elementary, high, K-12, and county high)	Generally not coterminous with established governmental units, except for county high school districts which are coterminous with the county
Nebraska	School districts (Class I, II, III, IV, V, and VI)	Generally not coterminous with established governmental units
Nevada	School districts	County or independent city (Carson City)
New Hampshire	Regular school districts	Town

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Table 2.
Agencies Legally Responsible for Providing Basic Public Education by State 1994-95 (Excludes the Outlying Areas) (Continued)

State	Unit(s) Responsible for Basic Education	Geographic Area Served
New Hampshire (continued)	City school systems	City
	Coos County School District	Coterminous with the unincorporated areas of Coos County
	Cooperative school districts	Coterminous with two or more towns
	Special school districts	Generally not coterminous with established governmental units
	Interstate School Districts	Coterminous with two or more towns in two or more states
New Jersey	School districts (Type II and regional)	Coterminous with one or more cities or towns
	Type I school districts	City or town
	County vocational school districts	County, but may exclude certain cities
New Mexico	School districts	Generally not coterminous with established governmental units
New York	City school districts	City
	Common school districts	Generally not coterminous with established governmental units. May not provide high school instruction
	Enlarged city school districts	City and additional territory
	Union free, central, and central high school districts	Generally not coterminous with established governmental units
North Carolina	County and city school administrative units	County or city
North Dakota	School districts	Generally not coterminous with established governmental units
	Military installation school districts	Coterminous with a federal military installation
Ohio	City and exempted village school districts	Generally coterminous with a city or village, but boundaries may vary.
	Local school districts	Generally not coterminous with established governmental units
Oklahoma	School districts (independent and elementary)	Generally not coterminous with established governmental units
Oregon	School districts (county unit, common, joint, and union high)	Generally not coterminous with established governmental units

Table 2.
Agencies Legally Responsible for Providing Basic Public Education by State 1994-95 (Excludes the Outlying Areas) (Continued)

State	Unit(s) Responsible for Basic Education	Geographic Area Served
Pennsylvania	School districts (first class, first class A, second, third, and fourth class)	A few are coterminous with cities or towns, but most are not coterminous with established governmental units
Rhode Island	Municipal school systems	City or town
	Regional school districts	Two or more cities and/or towns
South Carolina	Countywide school districts	County
	Independent school districts	Generally not coterminous with established governmental units. Only found in counties not served by a countywide school district
South Dakota	School districts	Generally not coterminous with established governmental units
Tennessee	Special school districts	Generally not coterminous with established governmental units
	Municipal school systems	City
	County school systems	County, except for portions served by a municipal school system or special school district
Texas	School districts (common, independent, municipal, industrial training, rehabilitation, special purpose, and rural high)	Generally not coterminous with established governmental units
Utah	City and county school districts	City or county, but some county school districts only serve portions of a county
Vermont	City and town school districts	City or town, except in towns which contain incorporated school districts
	Incorporated school districts	Usually encompass part, but not all of a town
	Union and unified school districts (including joint contract districts)	Coterminous with two or more cities and/or towns
	Interstate school district	Serves one town in New Hampshire, and one in Vermont
	Education of children in unorganized towns, gores, and grants	Unincorporated areas of the state
Virginia	County, city, and town school systems	County, city, or town
Washington	School districts	Generally not coterminous with established governmental units
West Virginia	County school districts	County

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Table 2.
Agencies Legally Responsible for Providing Basic Public Education by State 1994-95 (Excludes the Outlying Areas) (Continued)

State	Unit(s) Responsible for Basic Education	Geographic Area Served
Wisconsin	School districts (common, unified, union high, and first class)	Generally not coterminous with established governmental units
Wyoming	School districts (elementary and unified)	A few serve a single county, but most are generally not coterminous with established governmental units

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